

*Building trust
by delivering support,
protection and justice*

Finland

First thematic
evaluation report

GREVIO

Group of Experts
on Action against Violence
against Women and
Domestic Violence



Council of Europe Convention
on preventing and combating
violence against women
and domestic violence
(Istanbul Convention)

GREVIO(2024)9
published on 3 December 2024

First thematic evaluation report

**Building trust by delivering
support, protection and justice**

FINLAND

Group of Experts
on Action against Violence against Women
and Domestic Violence (GREVIO)

GREVIO(2024)9

Adopted by GREVIO on 18 October 2024

Published on 3 December 2024

Secretariat of the monitoring mechanism of the Council of Europe Convention
on Preventing and Combating Violence against Women and Domestic Violence
Council of Europe
F-67075 Strasbourg Cedex
France

www.coe.int/conventionviolence

Contents

Executive summary	4
Introduction.....	7
I. Emerging trends in the areas of violence against women and domestic violence	9
II. Changes in definitions, comprehensive and co-ordinated policies, funding and data collection in the areas of violence against women and domestic violence	12
A. Definitions (Article 3)	12
B. Comprehensive and co-ordinated policies (Article 7).....	13
C. Financial resources (Article 8)	15
D. Data collection (Article 11).....	16
III. Analysis of the implementation of selected provisions in priority areas in the fields of prevention, protection and prosecution	19
A. Prevention.....	19
1. General obligations (Article 12).....	19
2. Education (Article 14).....	21
3. Training of professionals (Article 15).....	23
4. Preventive intervention and treatment programmes (Article 16)	26
B. Protection and support	28
1. General obligations (Article 18).....	28
2. General support services (Article 20).....	29
3. Specialist support services (Article 22).....	32
4. Support for victims of sexual violence (Article 25)	35
C. Substantive law	36
1. Custody, visitation rights and safety (Article 31).....	36
2. Prohibition of mandatory alternative dispute resolution processes or sentencing (Article 48)	38
D. Investigation, prosecution, procedural law and protective measures	40
1. General obligations (Article 49) and Immediate response, prevention and protection (Article 50)	41
2. Risk assessment and risk management (Article 51).....	45
3. Emergency barring orders (Article 52).....	47
4. Restraining or protection orders (Article 53).....	47
5. Measures of protection (Article 56)	49
Appendix I List of proposals and suggestions by GREVIO	51
Appendix II List of the national authorities, other public bodies,non-governmental organisations and civil society organisations with which GREVIO held consultations .	57

Executive summary

This evaluation report addresses progress made in bringing support, protection and justice to victims of violence against women and domestic violence under selected provisions of the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (the Istanbul Convention). It offers an assessment made by the Council of Europe Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO) an independent human rights monitoring body mandated to monitor the implementation of the convention. GREVIO's findings identify developments that have taken place since publication of its baseline evaluation report on Finland on 2 September 2019 and are based on the information obtained during its first thematic evaluation procedure as set out in Article 68 of the convention. These include written reports (a state report submitted by the country authorities and additional information submitted by the Sami Parliament, the Finnish League for Human Rights, a coalition of twenty five NGOs, Organisation VIOLA, Transfeminiinit ry Finland, the Finnish National Human Rights Institution and the Finnish Non-Discrimination Ombudsman); as well as a five-day evaluation visit to Finland. A list of the bodies and entities which GREVIO had exchanges with can be found in Appendix II.

The report assesses the wide variety of measures taken by the Finnish authorities to prevent violence against women and domestic violence and to deliver protection, support and justice for victims – the theme chosen by GREVIO for its first thematic evaluation report. In identifying emerging trends in preventing and combating violence against women and domestic violence, GREVIO shines a light on laudable efforts made for the implementation of this convention. Moreover, it provides in-depth information on the implementation of selected provisions in the areas of prevention, protection and prosecution as building blocks for a comprehensive response to the different forms of violence against women that instils trust in victims.

In this regard GREVIO welcomes the important steps taken by Finnish authorities since the adoption of its baseline evaluation report to further align national legislation with the requirements of the Istanbul Convention. Notably, these efforts include the adoption of a consent-based approach to the definition of rape. In addition, legislative amendments have been enacted to permit the dissolution of forced marriages, and reforms to the Finnish Act on Restraining Orders have been introduced to enhance the protection of domestic violence victims. Further legislative developments are also forthcoming, including explicit criminalisation of forced marriage and female genital mutilation (FGM). With respect to policy-making efforts, GREVIO commends the explicit recognition of the gendered nature of violence against women in the most recent Action Plan for the implementation of the Istanbul Convention, covering the period 2022-2025. The assignment of the role of monitoring and evaluating national policies to prevent and combat violence against women to the Finnish National Rapporteur within the Office of the Non-Discrimination Ombudsman facilitates the independent monitoring and evaluation of these policies. In the area of prevention, amendments to various educational laws and policies have been introduced to prioritise equality within the education system and ensure a safe learning environment for all students.

In the area of protection, GREVIO welcomes the expansion of the SERI support centres network, which offers holistic, trauma-informed services to victims of sexual assault, and acknowledges steps taken to provide specialist support and shelter services for women victims of violence with addiction issues.

To enhance the criminal justice system's response to violence against women, GREVIO welcomes the Finnish authorities for implementing measures such as the expansion of the MARAC network, which conducts thorough risk assessments in cases of violence against women and establishes co-ordinated safety plans, as well as improving the system of emergency barring and restraining orders to make them more accessible to victims.

Despite the progress made in Finland across all four pillars of the convention, GREVIO has identified areas requiring further action by the authorities to achieve full compliance with its provisions.

Within the policy landscape, the lack of systematic collection of administrative data disaggregated by the relationship between the perpetrator and the victim - particularly within the law enforcement and criminal justice sectors - limits the data's ability to provide a comprehensive understanding of reporting, prosecution, attrition, and conviction rates in cases of violence against women, thus impeding evidence-based policymaking efforts in this area. GREVIO also calls upon the national co-ordinating body, the NAPE Committee, to capitalise on its resources and authority to achieve tangible results in the implementation of the national policy framework.

A persistent concern regarding prevention efforts is the absence of mandatory in-service training for many relevant professional groups, including judges and public prosecutors, on issues related to the Istanbul Convention. While many receive some form of initial training, subsequent training remains voluntary, which adversely affects their understanding and knowledge of various forms of violence against women.

In the area of protection, GREVIO expresses concern over the ongoing lack of culturally and linguistically appropriate generalist and specialist services for Sami victims of violence against women, including the insufficient availability of shelters within the Sami homeland.

While acknowledging the added value of MARAC networks in the well-being services counties where they are established, GREVIO points out that these networks are still absent in many regions, and where they do exist, their working methods and compositions vary significantly. While efforts have been made since the baseline evaluation to ensure that repeated cases of domestic violence are exempt from criminal mediation, GREVIO remains concerned about the discontinuation of criminal investigations in other cases of violence against women due to mediation. Similarly, although the system of emergency barring and restraining orders has been reformed, their implementation remains limited. GREVIO further notes, that despite the significant prevalence of the digital dimension of violence against women, the criminal justice response to such forms of violence requires improvement.

GREVIO has identified a number of additional issues that require sustained action in order to effectively build trust by delivering protection, support and justice for acts of violence against women. These relate to the need to:

- develop a long-term comprehensive action plan/strategic policy document giving due importance to all forms of violence covered by the Istanbul Convention;
- ensure sufficient public funding for the Action Plan for the Istanbul Convention and develop sustainable financing solutions for NGOs providing non-residential specialist services;
- conduct continuous awareness-raising campaigns on all forms of violence against women that reach all segments of society;
- establish sustainable nationwide programs for perpetrators of domestic violence, including culturally appropriate options for Sami boys and men, and integrate these programs into the criminal justice system to improve attendance and reduce recidivism;
- set up institutionalised structures for multi-agency co-ordination and co-operation among governmental and non-governmental agencies and service providers across the country;
- establish long-term support services to facilitate the recovery of victims and promote their economic independence;
- increase the number and capacity of women-only shelters that provide safe accommodation for victims of all forms of violence against women;
- remove any barriers, including the 30-day time limit, that hinder victims' access to the full range of specialist services provided by the SERI centres;
- ensure that the impact of violence against women on children is reflected in legislation by making it a mandatory factor in custody decisions, and implement systematic screening to assess whether violence was present in the relationship;
- systematically integrate a gender-sensitive and trauma-informed understanding of all forms of violence against women into police procedures;

- ensure that investigations and criminal proceedings regarding all forms of violence against women under the Istanbul Convention are conducted promptly, with authorities proactively collecting evidence beyond the victim's statement to facilitate effective prosecution.

Lastly, GREVIO has identified further areas in which improvements are required to comply fully with the obligations of the convention under this round's theme. These include the establishment of standardised care paths in public and private healthcare for the identification, diagnosis, treatment, and documentation of violence against victims, as well as the need to assess the extent of utilisation of relevant materials developed by the National Agency for Education.

Introduction

The Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (CETS No. 210, the Istanbul Convention) is the most far-reaching international treaty to tackle violence against women and domestic violence.

It sets up a two-pillar monitoring mechanism to assess the level of implementation by its parties: the Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO), an independent expert body, and the Committee of the Parties, a political body composed of official representatives of the parties to the convention. In line with Article 68 of the convention, GREVIO has been providing country-based monitoring reports under its baseline evaluation procedure since 2017. Its baseline evaluation report on Finland, offering a comprehensive assessment of the convention's implementation in its entirety, was published on 2 September 2019, following Finland's ratification of the Istanbul Convention on 17 April 2015. Finland's original reservation not to apply the provisions under Article 55, paragraph 1, to petty assault when the offence is committed against a person other than the person referred to in Chapter 21, Section 16, subsection 1 of the Criminal Code of Finland, entered in accordance with Article 78, paragraph 2, of the convention, was renewed by declaration dated 29 April 2020 without providing GREVIO with the reasons for maintaining it.

This report was drawn up under GREVIO's first thematic evaluation round launched in 2023 focusing on the theme of building trust by delivering support, protection and justice. To address this overarching theme, it describes emerging trends in the areas of preventing and combating violence against women and domestic violence in the country. Section two aims to identify developments in key areas such as comprehensive and co-ordinated policies, funding and data collection that have ensued following the completion of the baseline evaluation procedure. Section three presents more in-depth information on the implementation of selected provisions in the areas of prevention, protection and prosecution, in light of significant challenges and need for further action revealed by the baseline evaluation procedures and the conclusions on the implementation of recommendations from the Committee of the Parties to the Istanbul Convention.

In respect of Finland, the first thematic evaluation procedure was initiated in accordance with Article 68 of the convention by letter and transmission of GREVIO's first thematic questionnaire on 26 May 2023. The Finnish authorities subsequently submitted their state report on 26 October 2023 – the deadline set by GREVIO. Following a preliminary examination of Finland's state report, GREVIO carried out an evaluation visit to Finland, which took place from 15 to 19 January 2024. The delegation was composed of:

- Pille Tsopp-Pagan, Member of GREVIO
- Grzegorz Wrona, Member of GREVIO
- Elif Sariaydin, Administrator at the Secretariat of the Monitoring Mechanism of the Istanbul Convention.

During the evaluation visit, the delegation met with a wide range of governmental and non-governmental representatives working in the area of preventing and combating violence against women. GREVIO wishes to highlight its constructive exchanges with the Finnish authorities, in particular Pekka Puustinen, Under Secretary of State. A list of the national authorities, non-governmental organisations and others met is set out in Appendix II of this report. GREVIO is grateful for the valuable information provided by all of them. For the co-operation and support provided throughout the entire evaluation procedure, it wishes to extend its gratitude to Marjatta Hiekka, Legal Counsellor at the Unit for Human Rights Courts and Conventions at the Ministry of Foreign Affairs, who was appointed as contact person. The state report and the written contributions submitted by civil society are available on the country monitoring website of the Istanbul Convention.¹

1. See www.coe.int/en/web/istanbul-convention/finland.

The present assessment was drawn up under the exclusive responsibility of GREVIO and is based on the information collected during the various steps of the evaluation procedure. In keeping with the approach adopted in its baseline evaluation reports, the findings reflect different levels of urgency, indicated in order of priority by the following verbs: “urges”, “strongly encourages”, “encourages” and “invites”.

Resulting from a process of confidential dialogue with the aim of offering country-specific proposals and suggestions for improvement within the national context of the party under review, this report describes the situation as observed by GREVIO up until 21 June 2024. Where applicable, relevant developments up until 18 October 2023 have also been taken into account.

According to the convention, national parliaments shall receive this report from the national authorities (Article 70, paragraph 2). GREVIO requests the national authorities to translate this report into their official national language(s) and to ensure that it is widely disseminated, not only to the relevant state institutions at all levels (national, regional and local), in particular to the government, the ministries and the judiciary, but also to NGOs and other civil society organisations that work in the field of violence against women.

I. Emerging trends in the areas of violence against women and domestic violence

1. In the period following the adoption of GREVIO's baseline evaluation report, GREVIO identified several trends in Finland in the area of preventing and combating violence against women. Some of these trends were related to legislative developments prompted by broader societal movements, while others pertained to shifts in attitudes and approaches in addressing violence against women.

Legislative changes and ongoing legal review for improved criminal justice for victims of sexual violence, domestic violence and forced marriage

2. GREVIO notes that since the adoption of the baseline evaluation report, Finland has undertaken legislative efforts aimed at enhancing its compliance with the requirements of the convention. A significant example of these efforts, which was also praised by the Committee of the Parties to the Istanbul Convention in its conclusions on the implementation of recommendations adopted in respect of Finland, is the reform of sexual offences, which came into effect on 1 January 2023.² Accordingly, the Finnish Criminal Code now defines rape as "sexual intercourse with a person who does not participate in it voluntarily", marking a notable departure from the previous force-based definition of this offence. This shift towards a consent-based approach is also evident in other sexual offences outlined in Chapter 20 of the Criminal Code, including sexual abuse and aggravated sexual abuse. Additionally, the amendments explicitly criminalise image-based abuse while also imposing stricter sanctions for sexual offences. Furthermore, the revisions to the provision concerning sexual harassment expanded its scope to include acts other than touching if sufficiently severe. GREVIO commends these developments as a crucial step towards enhancing the trust of victims of all forms of sexual violence to seek justice.

3. In relation to forced marriage, recent legal amendments to the Marriage Act now permit the dissolution of forced marriages, which previously could only be terminated through a divorce. In addition, a draft bill seeks to explicitly include forced marriage within the scope of the human trafficking provisions in the Criminal Code. Additionally, the draft bill proposes sanctions for the act of compelling an individual to remain in a forced marriage. GREVIO welcomes this initiative but notes that experts in the field view the human trafficking legislation as highly complex, leading to certain instances of forced marriage that do not clearly meet the criteria of trafficking or coercion being overlooked. These include, for instance, cases where parents compel their adult children to marry, believing it to be in the child's best interests.³

4. Similarly, a draft bill has been prepared to explicitly criminalise the act of committing female genital mutilation (FGM) as well as taking a woman or girl abroad for FGM or otherwise forcing or inducing a woman or girl to undergo FGM. Equally, a legal analysis regarding the criminalisation of coercive control and psychological violence in 2022 concluded that the existing legislation falls short of effectively punishing these forms of violence.⁴ Last, GREVIO notes with interest that the Act on Restraining Orders has undergone substantial revisions aimed at addressing the concerns raised by GREVIO in the baseline evaluation report, which equally aim at building a trust-based system of protection and support for victims.⁵

Gaps in addressing the digital dimension of violence against women

5. According to the Gender-based Violence Survey carried out in 2021, women experience a disproportionate amount of online harassment compared to men, with 48% of women reporting such

2. Conclusions on the implementation of recommendations in respect of Finland adopted by the Committee of the Parties to the Istanbul Convention, IC-CP/Inf(2023)7, adopted on 1 June 2023.

3. Written submission from the Finnish League for Human Rights, p. 3.

4. Ministry of Justice, Report on the Punishability of Psychological Violence and Legal Practice of Stalking in Finland, 2023, available in Finnish at: www.julkaisut.valtioneuvosto.fi/handle/10024/164912.

5. See Article 52, Emergency barring orders, and Article 53, restraining or protection orders.

experiences. GREVIO further notes with concern the growing incidence of online violence and sexist hate speech targeting women journalists and politicians. A NATO report conducted in 2021 found that the female-led Finnish government at the time was overwhelmingly targeted by misogynistic online harassment.⁶ Another example is the extensive online smear campaign against a female journalist, which has prompted the Council of Europe Commissioner for Human Rights to call on the Finnish authorities to condemn these acts and to conduct a thorough investigation into the incident.⁷

6. Despite the widespread nature of this phenomenon, findings of a recent study reveal that instances of digital violence against women are often overlooked in Finland, both as a form of violence and as a criminal offence, even in severe cases, due to the absence of physical evidence typically associated with violence in the offline world.⁸ Significant shortcomings were identified in the efforts of support services, law-enforcement agencies and criminal justice authorities to both identify and address instances of digital violence, which exhibited victim-blaming attitudes and a tendency to downplay the severity of the impact of such violence. This information highlights that a significant portion of victims of online and technology-facilitated violence do not receive the necessary support and justice. GREVIO's General Recommendation No. 1 on the digital dimension of violence against women can serve as comprehensive guidance for the Finnish authorities to tackle this complex phenomenon.⁹

Situation of asylum-seeking and migrant victims of violence against women: a mixed picture

7. Finland has undertaken measures aimed at enhancing the international protection of women vulnerable to gender-based persecution. In this regard, GREVIO commends the announcement made by the Immigration Service of Finland in February 2023, when it declared that gender alone would suffice as grounds for granting protection to Afghan women and girls, given the heightened risk of persecution they face upon return to their home country.¹⁰ The explicit recognition that living under an oppressive regime where the human rights of women and girls are systematically restricted constitutes gender-based persecution is a significant advancement in enhancing the protection of asylum-seeking women from Afghanistan. GREVIO emphasises that the recognition of gender-based violence as a form of persecution should extend to all women victims of such violence, and that existing concerns pertaining to generally prolonged asylum-processing times and extended periods of immigration detention, including of women who are victims of gender-based violence, should be addressed.¹¹ GREVIO notes that women and girls in institutions and places of detention are particularly vulnerable to experiencing violence and/or may be dealing with trauma from past experiences of violence. It thus highlights the importance of ensuring that the residents of asylum reception and immigration detention centres have access to specialist support services and effective protection mechanisms for their experiences of gender-based violence.

6. NATO Strategic Communications Centre for Excellence, "Abuse of power: coordinated online harassment of Finnish government ministers", 2021, available at: www.stratcomcoe.org/publications/abuse-of-power-coordinated-online-harassment-of-finnish-government-ministers/5.

7. Statement of the Council of Europe Commissioner for Human Rights, "Online threats against Finnish journalist Ida Erämaa should be investigated and condemned", 2023, available at: www.coe.int/is/web/commissioner/-/online-threats-against-finnish-journalist-ida-er%C3%A4maa-should-be-investigated-and-condemned.

8. Tampere University, "Challenges of tackling digital violence against women in police work, criminal procedure, and support services", 2024, available in Finnish at: www.julkaisut.valtioneuvosto.fi/handle/10024/165353.

9. GREVIO General Recommendation No. 1 on the digital dimension of violence against women, adopted on 20 October 2021, Council of Europe, 2021, available at: www.rm.coe.int/grevio-rec-no-on-digital-violence-against-women/1680a49147.

10. Finnish Immigration Service, Refugee status to Afghan women and girls, 2023, news item available at: www.migri.fi/en/-/refugee-status-to-afghan-women-and-girls?ref=newsroom.

11. Written submission from 25 Finnish NGOs, p. 37.

8. As for the situation of migrant women, according to women's rights organisations, there have been instances where victims of domestic violence have been denied a residence permit if it is linked to their spouse's residency, irrespective of the violence suffered.¹² GREVIO notes that such instances where the right to an independent residence permit for victims of violence against women is impeded result in eroding victims' trust in the system to report violence and instead forces women to remain in abusive relationships out of fear of deportation and separation from their children.

12. In a decision dated 2022 the Finnish Immigration Service revoked the residence permit of a domestic violence victim who arrived in Finland via family reunification as a result of not sharing the same address with her spouse. This decision of the Immigration Service was overturned by the Finnish Supreme Administrative Court in 2023.

II. Changes in definitions, comprehensive and co-ordinated policies, funding and data collection in the areas of violence against women and domestic violence

9. Chapter I of the Istanbul Convention sets out general principles that apply to all the substantive articles contained in Chapters II to VII and therefore lay the foundation for a comprehensive and adequate response that ensures the delivery of support, protection and justice for all women and girls at risk of or who have experienced gender-based violence. These include, among other things, that it is a fundamental human right for everyone, particularly women, to live a life free from violence in both the public and the private sphere, that the convention must be implemented without discrimination on any ground and that the potential for, and effects of, multiple forms of discrimination should be borne in mind. They also spell out that a gender perspective must be integrated into the implementation of the convention and the evaluation of its impact. Chapter II of the Istanbul Convention sets out the core requirement for a holistic response to violence against women: the need for state-wide effective, comprehensive and co-ordinated policies, sustained by the necessary institutional, financial and organisational structures.

A. Definitions (Article 3)

10. Article 3 of the Istanbul Convention sets out key definitions of concepts that are fundamental to its implementation. “Violence against women” refers to “all acts of gender-based violence that result in, or are likely to result in, physical, sexual, psychological or economic harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life”, whereas the expression “domestic violence” is to be understood as referring to “all acts of physical, sexual, psychological or economic violence that occur within the family or domestic unit or between former or current spouses or partners, whether or not the perpetrator shares or has shared the same residence with the victim”. The definition of “gender-based violence against women” provided in paragraph *d* of Article 3 seeks to ensure more clarity about the nature of the violence covered, by explaining that this is “violence that is directed against a woman because she is a woman or that affects women disproportionately”.

11. In its baseline evaluation report, GREVIO had criticised the adoption of gender-neutral language in the national policy documents in force at the relevant time, in particular the Action Plan for the Istanbul Convention 2018-2021, which represented a shift from former policies that explicitly recognised the gendered nature of violence against women and domestic violence.

12. This concern has since been addressed through the adoption of a new Action Plan for the Istanbul Convention covering the period 2022-2025 by the Committee for Combating Violence against Women and Domestic Violence (the NAPE Committee). This action plan explicitly emphasises the gendered nature of violence against women, which GREVIO commends as an indicator of Finland’s strong dedication to the implementation of the Istanbul Convention.

13. In addition to the Action Plan for the Istanbul Convention for the period 2022-2025, the Ministry of Justice co-ordinated the development and implementation of a separate Action Plan for Combating Violence against Women for the period 2020-2023. This policy document aimed to complement the Action Plan for the Istanbul Convention by providing specific measures on certain forms of violence against women such as “honour-related violence” and the digital dimension of violence against women. GREVIO notes that neither these two action plans nor other policy documents or legislation set out common definitions of domestic violence or any other form of violence against women, except for “honour-related violence” which is defined in the Action Plan for Combating Violence against Women and Domestic Violence (2020-2023) as a phenomenon related to domestic violence, rooted in a collective group’s control—such as that of a family, clan, or community — over an individual’s gender-based morality, manifesting in various forms including psychological, physical, sexual, and economic violence, female genital mutilation, forced marriages, and even killings.

B. Comprehensive and co-ordinated policies (Article 7)

14. Article 7 of the Istanbul Convention requires parties to take co-ordinated and comprehensive measures to prevent and combat all forms of violence against women. Policies must ensure effective co-operation and place the rights of victims at their centre. This includes taking into account and addressing the specific circumstances and barriers experienced by women exposed to or at risk of multiple forms of discrimination,¹³ in line with Article 4, paragraph 3, of the convention. Ensuring service delivery, effective protection and justice with a comprehensive understanding of intersecting forms of discrimination is a fundamental element in building trust among all women and girls.

15. Since the baseline evaluation, in which GREVIO had noted the lack of a comprehensive approach in the existing action plan at the time, new measures have been introduced addressing the various concerns, notably around multi-agency co-operation, by foreseeing the establishment of multi-agency structures for preventing violence against women at the national level as well as within well-being services in counties and municipalities under the Action Plan for the Istanbul Convention for 2022-2025, which GREVIO welcomes. GREVIO notes that while setting out measures across the four pillars of the Istanbul Convention, this action plan does not specifically target different forms of violence against women, aside from a few selective measures. These include initiatives aimed at expanding the Support Centre for Victims of Sexual Assault (SERI) network for victims of sexual violence, prevention of sexual harassment within the sports, arts, and cultural sectors and enhancing the accessibility of healthcare and social welfare systems for victims of “honour-related violence” and FGM.

16. In addition to the Action Plan for the Istanbul Convention, the Ministry of Justice also developed an Action Plan to Combat Violence against Women for 2020-2023, which primarily comprised initiatives focused on prevention of and awareness raising about “honour-related violence” and the digital dimension of violence against women. Additionally, certain specific measures were foreseen to raise awareness among bystanders of sexual harassment, develop quality standards for perpetrator programmes and issue guidelines for regional authorities to enhance interagency co-ordination. GREVIO notes the information provided by Finnish authorities that this action plan will not be renewed.

17. GREVIO acknowledges that both of these action plans were designed to prevent overlap and that their respective co-ordinating bodies – the NAPE Committee and the Ministry of Justice – worked in tandem to ensure their implementation and monitoring. However, the measures outlined in the Action Plan to Combat Violence against Women co-ordinated by the Ministry of Justice appear to consist of initiatives targeted at specific aspects of certain forms of violence against women. While the Action Plan for the Istanbul Convention, co-ordinated by the NAPE Committee, aims to establish a comprehensive framework addressing all forms of violence against women covered by the Istanbul Convention, GREVIO observes that the specific measures outlined within the plan predominantly concentrate on domestic and sexual violence. Moreover, the existing measures remain general in nature, lacking concrete indicators for their implementation. This approach results in the invisibility of certain forms of violence against women, such as psychological violence, stalking, forced marriage, forced abortion and forced sterilisation, within the overall policy landscape in Finland. While GREVIO welcomes the attention that is being placed on several of these forms of violence by means of the ongoing criminal law reforms, these efforts are not supported by wider preventive or protective measures. Furthermore, while recognising the increased exposure of women facing intersectional discrimination to violence such as Sami women, Roma women, women with disabilities and those with addiction issues, the action plans lack concrete measures to address the needs of these specific groups of women.

18. Concerning the co-ordination of measures at the national level, the NAPE Committee is responsible for overseeing and co-ordinating the implementation of the convention in Finland. This committee comprises representatives from ministries and their sub-entities. Although there is an

13. These include, but are not limited to, women from national and/or ethnic minorities, Roma women, migrant, asylum-seeking and refugee women, women with disabilities, women without a residence permit, LGBTI women, women from rural areas, women in prostitution and women with addiction issues.

NGO working group within the committee, consisting of civil society representatives, GREVIO regrets that the role of this group is primarily advisory, with limited opportunities for exerting influence.¹⁴

19. GREVIO notes with satisfaction the measures taken to institutionalise the NAPE Committee as the co-ordinating body established under Article 10 of the Istanbul Convention. To this end, funding for the NAPE Committee has been incorporated into the central government's four-year budget since 2021. Additionally, since 2020, the NAPE Committee has been assigned a secretary general. Furthermore, the parliament has allocated supplementary resources for the NAPE Committee and the implementation of the Istanbul Convention, amounting to €300 000 each for the periods 2021-2022 and 2023-2024. Despite these measures, the committee's primary co-ordinating efforts appear to be limited to cataloguing the initiatives of each ministry outlined in the action plan, as it seemingly lacks the authority to incentivise action or generate concrete results.¹⁵

20. A significant obstacle to the implementation of co-ordinated policies nationwide arises from the authority vested in the newly established "well-being services counties", following the administrative reform of 2021. These counties operate autonomously from municipalities and the state, with their funding allocated from central government. As of January 2023, there were 21 operational well-being services counties in Finland, generally corresponding to the regions, except for the City of Helsinki, which retains its jurisdiction over social welfare and healthcare service provision. The counties bear substantial responsibilities and are tasked with providing services relevant to victims of violence against women, either directly or through outsourcing to private service providers and civil society organisations. These services include primary and specialised healthcare, mental health services, maternity and child health clinics, adult social work, child welfare, and services for individuals with disabilities, those with addiction issues and the elderly.

21. GREVIO notes that although the central authorities make efforts to standardise policy implementation across well-being services counties, such as by issuing national guidelines, the absence of legally binding obligations on regional and local authorities to ensure the implementation of national policies poses a challenge in incentivising these counties to align their efforts. These regional disparities are apparent in nearly all aspects related to violence against women, spanning from prevention initiatives¹⁶ to the provision of shelter services and other specialised support services,¹⁷ risk-assessment practices¹⁸ and interagency co-ordination mechanisms.¹⁹ Indeed, in 2023, the Finnish Institute for Health and Welfare (THL) conducted a review to assess the extent to which counties adhered to the guidelines on domestic violence prevention. The findings revealed that counties had implemented different mechanisms at varying speeds. Respondents in the study, consisting of professionals engaged in domestic violence work within the counties, voiced support for enacting a binding law to specify the responsibilities of local authorities in co-ordinating efforts to address violence against women at both regional and local levels.²⁰

22. In 2022, the role of the Finnish National Rapporteur on violence against women was established within the Office of the Non-Discrimination Ombudsman. The duties of the ombudsman, serving as the rapporteur on violence against women, entail monitoring and evaluating the implementation of the measures and policies to prevent and combat violence against women and domestic violence. GREVIO welcomes the allocation of this responsibility to an independent body, in conformity with the convention's requirements.

23. Last, GREVIO notes the need to increase policy-making efforts to address the needs of women who are exposed to intersectional discrimination. Information provided by state authorities, women's rights organisations and independent civil society organisations all highlight the heightened exposure of specific groups of women to various forms of violence. For example, within the school

14. Written submission from 25 Finnish NGOs, p. 5.

15. Information obtained during the evaluation visit.

16. See Article 12, General obligations.

17. See Article 22, Specialist support services.

18. See Article 51, Risk assessment and risk management.

19. See Article 18, General obligations.

20. *Ibid.*, p. 6.

system, girls with disabilities reported the most common experiences of sexual harassment, with a concerning rate ranging from 60 to 62%. Similarly, civil society organisations indicate that migrant women, older women and Sami women face violence and the threat of violence significantly more often, yet their experiences often remain unseen.²¹ While the Action Plan for the Istanbul Convention covering the period 2022-2025 recognises the increased exposure of certain groups of women to gender-based violence, GREVIO points to the continuing need to provide concrete measures to improve their access to support and justice.

24. Recalling the findings issued in its baseline evaluation report, GREVIO strongly encourages the Finnish authorities to develop a long-term national strategy that aims to achieve the comprehensive and co-ordinated policy approach required by the Istanbul Convention, giving due importance to all forms of violence against women and extending to all relevant entities and policy sectors, including social services, the healthcare sector, law enforcement and the judiciary as well as the family law sector. This strategy should be evaluated regularly on the basis of predefined indicators in order to assess its impact and ensure that policy making is based on reliable data.

C. Financial resources (Article 8)

25. Article 8 of the Istanbul Convention aims to ensure the allocation of appropriate financial and human resources for activities carried out by public authorities and by relevant non-governmental and civil society organisations.²²

26. GREVIO's baseline evaluation had identified several concerns regarding the allocation of resources to prevent and combat violence against women in Finland. Despite efforts to increase the sustainability of resources for specialist services, particularly domestic violence shelters, funding was found to be insufficient for adequate service provision. Additionally, public funding for NGOs and civil society organisations was often limited to individual projects or for one-year periods, jeopardising their sustainability. Disparities in funding and service provision across municipalities had highlighted the lack of formal obligations regarding service quantity and quality. Furthermore, GREVIO had noted with concern that national action plans had been implemented without dedicated funding, and the lack of transparency in budget allocation had further complicated an assessment of the sufficiency of financial resources dedicated to measures tackling violence against women.

27. GREVIO notes that although some supplementary funds have been allocated to specific initiatives addressing violence against women, regrettably, the majority of the concerns persist.

28. GREVIO observes that both central and regional authorities, which play an essential role in preventing and combating violence against women, are either underfunded or facing budget cuts. For example, the funds allocated to THL's expenditure in the state budget for 2024 are €300 000 less than in 2023. Similarly, although NAPE has been granted an operating grant of €150 000 in addition to the aforementioned supplementary funds, indications from civil society organisations suggest that this sum mainly covers human resources expenses.²³

29. At the regional level, the government allocated approximately €22.5 billion for well-being services counties in 2023, with a proposed increase to about €24.6 billion for 2024. While welcoming this increase, GREVIO points to the need to ensure the sustainability of the funding for SERI support centres and social welfare services for victims of violence against women, particularly in light of potential reductions in public spending due to economic recession.²⁴

30. Regarding the specialist services provided by NGOs, GREVIO notes with satisfaction that the change in the funding structure of shelters in 2015, transferring the financial responsibility from

21. Information obtained during the evaluation visit.

22. Explanatory Report to the Istanbul Convention, paragraph 66.

23. Written submission from 25 Finnish NGOs, p. 11.

24. Written submission from the Finnish National Human Rights Institution, p. 1.

local authorities to the central government, constitutes an important step in ensuring the sustainability of these essential services. GREVIO however observes that a number of other important specialist services are funded by the Funding Centre for Social Welfare and Health Organisations (STEA), often on a temporary or one-off project basis. In this respect, GREVIO notes that the absence of continuous funding for the Nollalinja helpline's chat function has led to restrictions in the operating hours of the chat service.²⁵

31. Last, GREVIO acknowledges the decade-old tradition of gender budgeting in Finland. However, it notes that the methodology used for gender budgeting is mostly focused on the qualitative evaluation of texts that are included in the main expenditure titles of the state budget. The budget allocations are not tagged according to their impact on gender equality and only a few budget allocations are specifically related to gender.²⁶ In this respect, GREVIO notes with regret that the Action Plan for the Istanbul Convention covering the period 2022-2025 does not have an allocated budget but is instead funded from the individual budgets of each line ministry, without earmarked funds. This approach renders it impossible to assess the percentage of overall public expenditure dedicated to the implementation of the action plan.

32. Recalling the findings issued in GREVIO's baseline evaluation report, GREVIO strongly encourages the Finnish authorities to:

- a. ensure sufficient public funding for measures included in the Action Plan for the Istanbul Convention aimed at preventing and combating all forms of violence against women, from both central government and well-being services counties while regularly assessing the financial and human resources needed for this purpose;**
- b. develop appropriate long-term and sustainable financing solutions for NGOs providing non-residential specialist services to victims of violence against women;**
- c. ensure that all relevant government agencies systematically introduce budget lines dedicated to measures to prevent and combat all forms of violence against women, in order to regularly monitor the level of the allocated budget spent with a view to demonstrating an increase over time in the budget earmarked and spent in this field.**

D. Data collection (Article 11)

33. Preventing and combating violence against women and domestic violence requires evidence-based policy making. The collection of systematic and comparable data from all relevant administrative sources is crucial in this regard, as is information on the prevalence of all forms of violence against women.

34. GREVIO notes that, since the adoption of the baseline evaluation report, data-collection efforts in Finland have focused on conducting research and surveys examining various forms of violence against women and their handling by different sectors. A very important step in this respect is the conducting of a nationwide survey on the prevalence of gender-based violence in 2021, based on the Eurostat methodology. The survey revealed a significantly high prevalence of violence against women, with 47% of women reporting experiencing physical or sexual violence at least once in their lives after the age of 15. GREVIO emphasises the importance of utilising this survey's findings in informing evidence-based policy making by Finnish authorities in their future endeavours to address violence against women. However, GREVIO notes with regret that, aside from research and survey initiatives, the administrative data-collection mechanisms used by different state actors have largely remained unchanged since the baseline evaluation report.

25. Written submission from 25 Finnish NGOs, p. 11.

26. European Parliament, Gender budgeting in the Member States, 2023, p. 4, available at: [www.europarl.europa.eu/RegData/etudes/BRIE/2023/754386/IPOL_BRI\(2023\)754386_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/BRIE/2023/754386/IPOL_BRI(2023)754386_EN.pdf).

1. Law-enforcement agencies and the justice sector

35. In its baseline evaluation, GREVIO had identified significant deficiencies in statistical data collection within the justice system of Finland. These shortcomings, including the absence of a specific data category pertaining to the relationship between the perpetrator and the victim, impeded the formation of a comprehensive understanding of various forms of violence against women and the corresponding response of the criminal justice system to such incidents.²⁷

36. GREVIO notes with regret that the information systems utilised by law enforcement, prosecution services and the courts have not undergone reform to address the concerns of GREVIO expressed in the baseline evaluation. These systems continue to lack a designated data category concerning the relationship between the perpetrator and the victim. Consequently, cases of violence against women cannot be adequately identified, as data collection is based on general offences, with the exception of stalking. Similarly, as highlighted in the baseline evaluation report, the data-collection process regarding restraining orders lacks a systematic requirement for registering the relationship between the perpetrator and the protected person.

37. While the law-enforcement agencies' data-collection system incorporates a flagging mechanism allowing for the categorisation of cases as "domestic violence", it lacks the capability to differentiate between intimate-partner violence and intergenerational violence. Moreover, these data are not transferrable to the information systems utilised by other entities within the criminal justice system, as their respective information systems remain disconnected.²⁸

38. According to information provided by the Finnish authorities, a reform of the data-collection systems within the justice system is underway and expected to be finalised by the end of 2024. This reform aims to facilitate the tagging of cases involving violence against women, domestic violence and human trafficking as well as to enable the tracking of cases across the entire justice chain.

39. As a positive development, GREVIO welcomes the recent publication by Statistics Finland that examines the progression of cases involving violence against women within the criminal justice system.²⁹ The study draws upon data sourced from two statistical compilations by Statistics Finland: "Statistics on offences and coercive measures" and "Prosecutions, sentences and punishments". Its objective is to provide insights into the reporting, prosecution and conviction of violent crimes against women occurring within domestic settings. GREVIO points to the importance of making use of the findings of this study in evidence-based policy-making efforts.

2. Healthcare sector

40. In its baseline evaluation report, GREVIO had acknowledged the existence of mechanisms in Finland that could potentially be used for collecting data on violence against women, such as the Finnish Care Register for Healthcare; however, whether it had been used for this purpose remained unclear.³⁰

41. Following the adoption of the baseline evaluation report, GREVIO notes with regret the lack of enhanced efforts to systematise data collection within the healthcare sector concerning the number of women and girls seeking assistance from public healthcare services as a result of their experiences of violence against women, including domestic violence. GREVIO notes, however, that the Finnish authorities have undertaken certain initiatives to analyse data on violence against women in the healthcare system within the framework of the Action Plan for the Istanbul Convention covering the period 2018-2021, albeit on a one-off basis. A noteworthy example of such efforts is the study on the cost of intimate-partner violence in Finland (LAKU), conducted by THL in 2022, in collaboration with Statistics Finland and the University of Jyväskylä. This study examined data

27. Baseline evaluation report, paragraphs 37-40.

28. State report, p. 14.

29. Statistics Finland, Report on the progression of violent crimes against women in the criminal process, 2024, available in Finnish at: www.julkaisut.valtioneuvosto.fi/handle/10024/165439.

30. Baseline evaluation report, paragraphs 41-43.

obtained from the information systems of law enforcement, shelters and national social and healthcare services with the objective of assessing the cost of domestic violence to the healthcare and social welfare sectors.

42. GREVIO acknowledges the significance of this ongoing study for assessing the domestic violence-related health costs, contributing to policy-making efforts and shaping healthcare responses. However, information available to GREVIO does not clarify whether all manifestations of violence occurring within intimate-partner relationships, including physical, psychological, sexual and economic forms, are comprehensively addressed in the study. Furthermore, it is not clear whether this exercise will be periodically repeated.

43. In terms of periodic data-collection efforts, GREVIO observes that THL gathers data on pregnant or delivering women to ascertain whether they have undergone FGM and defibulation procedures. This information is subsequently used to monitor the family and conduct preventive measures to deter future FGM practices on their female children.

3. Social services

44. At the time of the baseline evaluation, GREVIO had not been able to ascertain the extent to which the electronic register for social assistance had been used to document, among other things, victims' interactions with social services concerning any of the forms of violence addressed by the Istanbul Convention. This does not seem to be done, as GREVIO is unaware of any data collected by social welfare authorities on services provided to victims of violence against women.

45. GREVIO welcomes, on the other hand, the routine gathering by THL of data from providers of women's specialist services. For example, shelters annually submit statistics to THL regarding occupancy rates, feedback from victims on service quality, the number of adult victims and their underage children residing in shelters, duration of stay and types of violence experienced. The number of available shelter spaces is also updated online daily. Similarly, Nollalinja provides data on the frequency of contact, the sex of victims and perpetrators, and the types of violence.

46. Recalling the findings issued in its baseline evaluation report and the standards contained in the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data regarding the confidentiality and respect for the privacy of victims, perpetrators and other persons involved (CETS No. 108), GREVIO urges the Finnish authorities to:

- a. develop data categories for mandatory use by the law-enforcement agencies, prosecution services and the judiciary on the type of relationship between the perpetrator and the victim, in order to document the nature of their relationship more specifically;**
- b. harmonise data collection between law-enforcement agencies, prosecution services and the judiciary, with the aim of, *inter alia*, allowing the assessment of conviction, attrition and recidivism rates as well as following the progress of cases of violence against women and domestic violence through the justice system.**

47. GREVIO further encourages the Finnish authorities to extend data collection in the public and private healthcare sector to all forms of violence against women, including domestic and sexual violence, forced abortion and forced sterilisation, and to introduce data collection in the social welfare sector in relation to all forms of violence against women.

III. Analysis of the implementation of selected provisions in priority areas in the fields of prevention, protection and prosecution

A. Prevention

48. Chapter III of the Istanbul Convention contains a number of general and more specific obligations in the area of prevention. This section analyses the progress made since the baseline evaluation monitoring procedure towards the implementation of early preventive measures. It also covers progress made towards the implementation of the more specific preventive measures provided under this chapter in the areas of education, the training of all relevant professionals and perpetrator programmes. Ensuring the effective prevention of all forms of violence against women and domestic violence is an important step in rendering it unacceptable and reducing levels of perpetration.³¹ In turn, effective prevention empowers women and girls to speak out about their experiences and seek support and protection.

1. General obligations (Article 12)

49. Article 12 sets out a number of general preventive measures that represent the overarching principles of the parties' duty to prevent violence against women. These include the requirement to promote changes in the social and cultural patterns of behaviour of women and men, with a view to eradicating prejudices, customs, traditions and all other practices based on the idea of the inferiority of women or on stereotyped roles for women and men. A positive contribution to achieving such change can be made by men and boys acting as role models and advocating equality between women and men and mutual respect, including by speaking out against violence, engaging other men in ending violence against women or actively taking on caring responsibilities. Moreover, flowing from the premise that violence against women is a cause as much as a consequence of gender inequality, Article 12 further requires that parties adopt specific measures to empower women in order to enable them to recognise and reject discrimination, unequal power relations and, ultimately, reduce women's vulnerability to violence and achieve greater gender equality.

50. At the outset, GREVIO recognises that Finland has consistently been one of the top-ranking countries in both the European Union's Gender Equality Index and the World Economic Forum's Global Gender Gap Report. For instance, in 2023, with 74.4 points out of 100, Finland ranked 8th in the EU on the Gender Equality Index. Its score is 4.2 points above the score for the EU as a whole.³²

51. Nonetheless, the 2021 Gender-based Violence Survey reveals that violence against women remains a gendered phenomenon in Finland and regrettably is perceived as common by the public. This suggests that society still fails to fully recognise the extent of the issue; therefore, greater efforts are required to enhance societal awareness of its underlying causes, with the aim of ensuring prevention.

52. GREVIO notes that prevention is a main component of the Action Plan for the Istanbul Convention covering the period 2022-2025. One measure outlined under this section is to "enhance addressing the themes of gender equality, self-determination, and consent-based sexual culture as part of migrant-specific services". However, no additional initiatives aimed at the broader population or other specific groups in terms of general preventive measures, as outlined in Article 12 of the convention, have been foreseen. In this respect GREVIO stresses the importance of recognising violence against women as a pervasive phenomenon that concerns the whole population. Prevention efforts must, therefore, address all forms of violence against women and all pockets of society as the struggle against this violation of human rights and gender inequality is still far from having been won. GREVIO considers that more could be done to address societal attitudes, cultural norms and gender stereotypes rooted in the perceived inferiority of women. In this respect,

31. The importance of this endeavour has been reiterated and strengthened through the Dublin Declaration on the Prevention of Domestic, Sexual and Gender-Based Violence, adopted in Dublin, Ireland, by 38 member states of the Council of Europe.

32. EIGE, Gender Equality Index, Finland in 2023 Edition: www.eige.europa.eu/gender-equality-index/2023/country/FI.

GREVIO draws the attention of the Finnish authorities to Recommendation CM/Rec(2019)1 of the Committee of Ministers to member States on preventing and combating sexism, which can provide guidance on raising awareness of gender-based prejudices and stereotypes.

53. A noteworthy initiative was undertaken within the scope of the Ministry of Justice's Action Plan for Combating Violence against Women covering the period 2020-2023. Specifically, an awareness-raising campaign was conducted in 2021 to encourage witnesses to intervene in cases of sexual harassment against women. This campaign, featuring video, text and image advertisements on television, social media platforms and in outdoor spaces, enlisted the participation of various Finnish celebrities and social media influencers, including prominent male figures.

54. GREVIO also notes with interest the ERASE GBV campaign, implemented from 2019 to 2021, which sought to raise awareness in schools of the need to prevent gender-based violence. This initiative was also commended by civil society organisations for its efficacy in challenging harmful attitudes across various sectors of society.³³ GREVIO however could not obtain information on the number of schools that participated in this campaign or its means of implementation.

55. According to information provided by the authorities, THL has produced videos in languages such as Somali and Kurdish with the aim of preventing FGM. THL has also collaborated with various community-based NGOs to develop different materials for the eradication of harmful traditions and "honour-related violence". GREVIO observes that these materials are accessible on THL's website and certain efforts to enhance their outreach and dissemination have been taken by the THL such as incorporating the developed materials into their training initiatives and utilising various channels, such as social media, to extend their reach.

56. While GREVIO welcomes the aforementioned initiatives, it observes that they are one-off campaigns rather than systematic and long-term efforts covering all forms of violence against women. Additionally, these initiatives do not seem to have nationwide outreach, with the exception of the campaign targeting witnesses of sexual harassment. As also highlighted in the baseline evaluation report, GREVIO notes the absence of prevention activities aimed at empowering women and girls from specific groups and communities, such as Roma, Sami, migrant and refugee women, women with disabilities and LGBTI women. In this regard, GREVIO particularly underscores the importance of carrying out culturally and linguistically sensitive awareness-raising initiatives on violence against women experienced by Sami women among professionals that provide support and protection, as well as to victims themselves. The lack of available services in the Sami homeland, coupled with the potential loss of Sami identity upon leaving their communities and separating from the perpetrator, may result in domestic violence and violence against women being frequently addressed within the community or family context.

57. Recalling the findings issued in GREVIO's baseline evaluation report, GREVIO strongly encourages the Finnish authorities to:

- a. promote and conduct, on a regular basis and at all levels, awareness-raising campaigns on all forms of violence against women that affect all pockets of society in order to challenge societal attitudes, cultural norms and gender stereotypes rooted in the perceived inferiority of women, including in co-operation with national human rights institutions, equality bodies, civil society, cultural and media institutions and non-governmental organisations, especially women's rights organisations;**
- b. ensure that more preventive work is carried out to specifically address gender-based violence against women and girls with disabilities and other women at risk of intersectional discrimination, including, in particular, Sami women;**
- c. regularly carry out impact assessments of any awareness-raising campaigns and primary prevention measures taken.**

33. Written submission from 25 Finnish NGOs, p. 14.

2. Education (Article 14)

58. The drafters of the convention recognised the important role that formal and informal educational settings play in addressing the root causes of violence against women and girls. Article 14 therefore requires the design of teaching material that promotes equality between women and men, non-stereotyped gender roles, mutual respect, non-violent conflict resolution in interpersonal relationships and the right to personal integrity and informs learners of the different forms of gender-based violence against women, adapted to the age and capacity of learners and where parties deem appropriate. The obligation to promote these principles extends to informal educational facilities as well as any sports, cultural and leisure facilities. In this context, GREVIO underlines the importance of informing parents on the content of related courses, the qualifications of the persons providing the courses; and to whom any questions can be directed.

59. In its baseline evaluation report, GREVIO had welcomed the significant efforts undertaken by the Finnish authorities in the field of education to promote gender equality and address gender-based violence, which included the incorporation of compulsory sexuality education into the curriculums. However, GREVIO had also emphasised the necessity for enhanced training for teachers and other professionals within the education system to identify and respond to various forms of violence, including “honour-related violence” and FGM.

60. GREVIO acknowledges the continued positive momentum in the education sector following the baseline evaluation. Several laws were amended to strengthen its response to gender-based discrimination and violence. These amendments include the Act on Equality between Women and Men, which sets out measures for promoting equality in education and teaching. Additionally, the provisions on discrimination based on gender identity or gender expression in the Act on Equality between Women and Men were amended to extend its scope to early childhood education and care in 2023, requiring particular attention to be paid to the prevention and elimination of sexual and gender-based harassment. Moreover, amendments were made to various education acts in 2022, such as the Basic Education Act, the Basic Education Decree, the Act on Vocational Education and Training, the Act on General Upper Secondary Education and the Act on Preparatory Education Leading to an Upper Secondary Qualification. These legislative changes introduced measures to prevent bullying, harassment and violence in educational institutions and to ensure a safe learning environment for all.

61. GREVIO also welcomes the Finnish authorities’ efforts to address the findings of the baseline evaluation report regarding the necessity to enhance the understanding of different forms of violence among education sector professionals. Of particular note is the National Teacher Education Forum’s commitment to prevent sexual harassment and other inappropriate behaviour in the education system, including among students. This commitment involves recognising incidents of sexual harassment in schools and intervening immediately, as well as equipping future teachers with the necessary skills and tools to do so. GREVIO further notes with interest the ongoing plans to develop guidelines for institutions and organisations in the culture, arts and sports sectors to prevent sexual harassment.³⁴

62. However, while welcoming these developments, GREVIO observes a need for continued efforts to better integrate gender equality and combating violence against women into the school system. Women’s rights organisations report that courses on equality in teacher training programmes are optional, thus making the ability of teacher candidates to offer gender-sensitive teaching dependent on personal interest.³⁵ However, the Finnish authorities maintain that gender equality themes are integrated in a cross-cutting manner across all higher education institutions in teacher education, even in the absence of specific courses on this subject. GREVIO notes that teaching materials developed by the National Agency for Education for teachers to use in their instructional activities include elements aimed at addressing violence against women. However, the decision on whether to use them is ultimately at the discretion of the educators, a concern that was

34. Information obtained during the evaluation visit.

35. Written submission from 25 Finnish NGOs, p. 15.

highlighted in GREVIO's baseline evaluation and echoed by civil society.³⁶ GREVIO notes with regret that there is currently no system in place to evaluate the extent to which these materials are used by teachers.

63. GREVIO notes that certain measures have been taken since the baseline evaluation to increase teachers' understanding and knowledge of certain specific forms of violence against women, notably "honour-related violence" and FGM. These topics have been incorporated into in-service training programs for teachers under the course entitled "Participation, Safety, and Well-being." However, it remains unclear how many teachers have benefitted from this training, which appears to be voluntary.

64. Women's rights organisations have also brought to GREVIO's attention the need to provide training to educators concerning the unique manifestations of violence experienced by women and girls who face intersectional forms of discrimination, particularly women and girls with disabilities.³⁷ Despite certain initiatives carried out in close co-operation with civil society organisations, such as the development of materials in easily accessible language and professional training initiatives, online courses and open-access lectures for educators to address specific forms of violence against women and violence against women with intersectional identities, including image-based abuse, consent and gender-based violence against LGBTI women, GREVIO notes that these initiatives have remained as one-off projects reliant on temporary funding.³⁸

65. In terms of efforts to incorporate the consent-based approach adopted by the new legislation on sexual offences into the education system, GREVIO was informed that no specific measures were undertaken in this regard, as the existing curriculums were already designed to encompass a consent-based approach.³⁹ However, findings of studies and surveys looking at the prevalence of violence among young people indicate a need for increased efforts in this regard. For example, a study from the University of Tampere carried out in 2023 found that sexual violence was common in dating relationships among people aged 15 to 20 in Finland and that the experiences of sexual violence were strongly gendered. Accordingly, more than one in three girls (37%) reported that they have experienced some form of sexual violence in a relationship at least once.⁴⁰ The study highlighted the need to ensure that young people receive adequate sexuality education to recognise and uphold their rights and obligations as stipulated in the new consent-based legislation, a sentiment with which GREVIO concurs.⁴¹

66. **GREVIO encourages the Finnish authorities to:**

- a. **increase efforts to ensure the practical implementation of the requirement to include in school curriculums or to otherwise impart knowledge on the elements listed in Article 14 of the Istanbul Convention. To this end, GREVIO invites the Finnish authorities to assess whether and to what extent relevant material developed by the National Agency for Education is being used;**
- b. **strengthen mandatory initial and in-service training of educators on different forms of violence against women and girls covered by the Istanbul Convention, including "honour-related violence" and FGM, as well as violence against women and girls who face intersectional discrimination, but also on the digital manifestations of violence against women, with a view to enabling them to detect girls and boys at risk and to refer them to appropriate mechanisms for support and protection.**

36. Written submission from the Finnish Non-Discrimination Ombudsman, p. 11.

37. Written submission from 25 Finnish NGOs, p. 15.

38. Written submission from the Finnish Non-Discrimination Ombudsman, p. 11.

39. Information obtained during the evaluation visit.

40. Tampere University, Violence in young people's dating relationships – Results of a survey, 2023, p. 58.

41. Ibid.

3. Training of professionals (Article 15)

67. Building society's trust by delivering support, protection and justice to women and girls with experiences of gender-based violence requires well-trained professionals across a wide spectrum of fields. The standard set by the convention in its Article 15 is that of systematic initial and in-service training of all those who deal with victims or perpetrators of all acts of violence. The training that is required must cover the prevention and detection of such violence, equality between women and men, the needs and rights of victims and the prevention of secondary victimisation.

68. GREVIO's baseline evaluation had revealed a mixed picture regarding Finland's efforts to train professionals on violence against women. In this respect, GREVIO had observed that certain professional groups like social workers, health professionals and teachers received some form of initial training, albeit insufficient. The baseline evaluation report had found that law-enforcement agencies, prosecution services and the judiciary, however, relied solely on voluntary in-service programmes. GREVIO had found that the absence of systematic training for law enforcement and prosecutors affected responses to violence cases, especially those involving "honour-related violence".

69. GREVIO welcomes the efforts made by the Finnish authorities in recent years to improve professional training regarding violence against women, including within the framework of the Action Plan for Combating Violence against Women for 2020-2023. However, GREVIO notes with regret that Finland's overall professional training approach still predominantly relies on voluntary participation and that there is no systematic and mandatory initial or in-service training across any relevant professional groups, with the exception of mediators.

70. An important initiative undertaken by the Finnish authorities to enhance professional training is the introduction of an online course entitled "Stop the Violence" in 2019 by THL. This course was aimed at social and healthcare professionals, mediators, police college students, practising police officers and other relevant professionals and institutions such as shelters and universities. Initially focusing on domestic and intimate-partner violence, the course covered topics that included violence detection, trauma-informed intervention, multi-agency co-operation and information on available services nationwide. In 2022, this training was expanded with two new modules addressing the digital dimension of violence against women and "honour-related violence". While GREVIO appreciates the comprehensive nature of this programme, it highlights that participation in the training is voluntary for all professional groups except mediators and professionals working in domestic violence shelters. Additionally, GREVIO notes the absence of systematic tracking of professionals benefiting from this training. However, general data indicate that over 10 000 professionals, predominantly social workers, have completed at least one module.

71. For members of the judiciary, GREVIO notes with concern the lack of formal requirements for mandatory training on violence against women prior to entry into the profession. The authorities consider legal training at the university level to be sufficient, although there is no mandatory module or course focusing on violence against women.⁴² The career progression for candidate judges involves participation in the "junior judge programme", a recently established model that entails three years of employment at the courts, during which comprehensive training on general judicial matters and topics is provided. GREVIO notes with regret that this training programme does not include mandatory courses on violence against women. Instead, judges are referred to the Council of Europe's e-learning platform on Human Rights Education for Legal Professionals during their third year, as an optional learning course.

72. While GREVIO underscores its full respect for the principle of the independence and autonomy of the judiciary, as well as for judicial autonomy in the organisation of training, it notes at the same time the unique and essential role the judiciary plays in applying the Istanbul Convention and its principles that have been incorporated into national legislation. By virtue of this essential role,

42. Information obtained during the evaluation visit.

their decisions may directly engage states' responsibility.⁴³ When it comes to the training of judges, the growing corpus of baseline and thematic evaluation reports has consistently pointed to persistent shortcomings at the level of the courts, including in Finland, largely a result of insufficient knowledge of the nature and dynamics of violence against women among many judges and, as a result, low conviction rates for all forms of violence against women. It is therefore of paramount importance that, when adjudicating cases in criminal and civil law pertaining to violence against women, such decisions are informed and based on appropriate, specialist knowledge that addresses, *inter alia*, gender stereotyping. Indeed, this requires expertise on very complex phenomena such as trauma-induced victim behaviour, the "freeze, flop and befriend" reactions of victims of rape and the long-term harm and consequences of witnessing domestic violence on children, as well as in-depth knowledge on the standards of the Istanbul Convention. Such training needs cannot be sufficiently addressed by ad hoc, optional courses, but require mandatory and in-depth training of judges on relevant issues. It is encouraging that this is increasingly being recognised and that judicial training academies are moving towards mandatory training on violence against women to address the complex nature of these offences. This is supported by the information collected by the Council of Europe European Commission for the Efficiency of Justice (CEPEJ) in 2020 showing that 24 member states of the Council of Europe require some form of compulsory in-service training for judges,⁴⁴ and the complex nature of violence against women would merit inclusion of these topics. Ways must be found, therefore, to ensure that members of the judiciary are equipped with the necessary knowledge to respond to women victims of violence and their children in a manner that instils their trust in the judiciary and provides an adequate sense of justice. This is of acute relevance not only in the context of criminal proceedings, but also in relation to family law cases, where judicial decisions on custody and visitation often do not offer sufficient consideration for the safety concerns and needs of women and children leaving abusive relationships, frequently ignoring allegations of domestic violence and/or accepting agreements despite a history of domestic violence.

73. In the prosecution service, newly appointed prosecutors are required to undergo a three-day course in their first year, covering the fundamentals of prosecution work. Subsequent training activities appear to be voluntary after the completion of the first year, with no specialised training currently available on violence against women or domestic violence. GREVIO welcomes the information provided by the Finnish authorities that many prosecutors, particularly senior prosecutors specialising in domestic violence, have participated in the HELP Programme on violence against women. Additionally, GREVIO notes with interest the one-off training programme provided by Victim Support Finland (RIKU) on various forms of violence, which was attended by prosecutors, judges and legal counsels. However, women's rights organisations reported that the participation rate was significantly low, failing to meet the intended target.⁴⁵ According to information provided by the authorities, a training program on violence against women is being planned for 2025. This program will include modules on psychological and economic violence, as well as coercive control, which GREVIO welcomes. However, no information has been provided regarding whether this training will be made mandatory.

74. In the justice system, the sole group of professionals required to undergo mandatory initial training on domestic violence are the mediators specialised in domestic violence cases. This training encompasses topics such as the stages of the mediation process, assessment of the type of violence and the prerequisites for the parties to engage in mediation, including voluntariness. Additionally, it covers available support services for both victims and perpetrators, as well as theoretical discussions on the advantages and disadvantages of mediation. Furthermore, THL organises an annual one-day in-service training course on mediation in intimate-partner violence and domestic violence cases. While this training is voluntary, GREVIO welcomes the fact that the majority of practising mediators

43. The following are examples among many cases in the area of violence against women where the decisions of judge(s) engaged states' responsibility under the European Convention on Human Rights and led to a violation: *Vuckovic v. Croatia* (Application No. 15798/20, 12 December 2023), *J.L. v. Italy* (Application No. 5671/16, 27 May 2021) and *Carvalho Pinto de Sousa Morais v. Portugal* (Application No. 17484/15, 25 July 2017).

44. Council of Europe European Commission for the Efficiency of Justice (CEPEJ), *Qualitative Data on European Judicial Systems, 2020*, available at: www.public.tableau.com/app/profile/cepej/viz/QualitativeDataEN/QualitativeData.

45. Written submission from 25 Finnish NGOs, p. 16.

participate in it.⁴⁶ Mandatory initial training is also provided to volunteer mediators, which includes the completion of the Stop the Violence online course developed by THL.

75. For law-enforcement professionals, GREVIO welcomes the Finnish authorities' recognition of the baseline evaluation report's findings regarding shortcomings in the professional training of police officers and their commitment to addressing them. To enhance the capacities of police officers investigating cases of various forms of violence against women, several initiatives have been implemented. These initiatives include the introduction of a new training programme by the Police University College for all specialised police officers handling domestic violence cases⁴⁷ and the publication of a handbook on identifying, addressing and preventing domestic violence, both in 2022.⁴⁸ Furthermore, an online training module on domestic violence has been established on the intranet page of the police force and was made mandatory for all senior police officers by the end of 2023, a measure that GREVIO commends.⁴⁹ GREVIO further welcomes the plans to extend this requirement to all police officers in the future. An important criticism highlighted in GREVIO's baseline evaluation report pertained to the insufficient knowledge and awareness among police officers to effectively investigate cases of "honour-related violence".⁵⁰ To counter this, the newly introduced training programme and handbook encompass "honour-related violence" in addition to domestic violence, stalking and online and technology-facilitated violence. Nevertheless, despite these developments, women's rights organisations perceive the training offered to law-enforcement professionals and the awareness of the aforementioned guidelines among police officers as inadequate.⁵¹ It is therefore essential to conduct an evaluation to ascertain the extent to which the police adhere to and implement these guidelines and benefit from training initiatives.

76. In the fields of social welfare, education and healthcare, the initial training of relevant professionals occurs within their higher education pursuits in disciplines such as public health, law, medicine, education, psychology or social sciences. Yet, none of the universities of applied sciences mandate coursework directly addressing violence against women.⁵² According to information provided by the Finnish authorities, the independence of higher education institutions empowers them to delineate the curriculum they offer, thereby resulting in disparities in the education provided on violence against women across various universities.⁵³ A new study aimed at gathering information on the curricular options of various higher education institutions for aspiring social workers and psychologists will shed more light on the shortcomings, which GREVIO considers of utmost importance to be remedied. Regarding in-service training for professionals in education, social welfare and healthcare, a variety of training opportunities exists, some of which are conducted in collaboration with civil society organisations and RIKU, but none of which are mandatory.⁵⁴

77. On a more general note, while 40% of relevant professionals have reported having encountered victims of FGM,⁵⁵ information available to GREVIO indicates an overall lack of understanding and awareness among authorities, both at the national and municipal levels, concerning the specific manifestations of violence against women, including "honour-related violence", forced marriage and FGM. This is corroborated by information furnished by civil society organisations.⁵⁶ GREVIO stresses the importance of equipping all relevant professionals with the knowledge and skills regarding the specificities of various forms of violence in order to enhance victims' trust in the system and empower them to seek assistance.

46. State report, p. 28.

47. See a news item on the Finnish Police website, "Finnish police committed to improving domestic violence detection": www.poliisi.fi/en/-/finnish-police-committed-to-improving-domestic-violence-detection.

48. National Police Board, Functional manual for intervening and preventing domestic violence, 2022, available in Finnish at: www.poliisi.fi/documents/25235045/33939256/Toiminnallinen-k%C3%A4sikirja-l%C3%A4hisuhdev%C3%A4kivaltaan-puuttumiseksi-ja+ennalta-est%C3%A4miseksi-v8.pdf/37a14bb7-e4fc-df1b-35ce-c3df75063e8b/Toiminnallinen-k%C3%A4sikirja-l%C3%A4hisuhdev%C3%A4kivaltaan-puuttumiseksi-ja+ennalta-est%C3%A4miseksi-v8.pdf?t=1648047132809.

49. Information obtained during the evaluation visit.

50. Baseline evaluation report, paragraphs 67-68.

51. Written submission from 25 Finnish NGOs, p. 16.

52. *Ibid.*, p. 17.

53. State report, p. 29.

54. State report, pp. 28-29.

55. Information provided by the Finnish authorities during the evaluation process.

56. Written submission from the Finnish League of Human Rights, p. 1.

78. **Recalling the findings issued in the GREVIO baseline evaluation report and in view of the persistent gaps in ensuring mandatory training of professionals whose contribution to a trust-based system of support, protection and justice is vital, GREVIO urges the Finnish authorities to ensure the provision of systematic and mandatory initial and in-service training on all forms of violence covered by the Istanbul Convention and the cultural specificities of women belonging to vulnerable groups supported by standardised protocols aimed at identifying, providing support to and further referring victims to other services. Such training should focus on the victims' human rights, safety, individual needs and empowerment, and on the prevention of secondary victimisation through a victim-centred and trauma-informed approach, and should be provided to all those in the justice, law-enforcement, social welfare, healthcare and education sectors. The impact of such training efforts should be regularly evaluated and maximised by drawing on the expertise of women's rights organisations and providers of specialist services.**

79. **GREVIO further urges the Finnish authorities to ensure mandatory training of judges presiding over cases involving custody and visitation rights on:**

- a. **the negative effects that witnessing violence against women has on children and the importance of taking into account such instances when reaching a decision and/or agreeing or promoting mediation in such cases;**
- b. **the nature and dynamics of domestic violence, including the unequal power relations between the parties, as opposed to a mere conflictual relationship between spouses.**

80. **GREVIO also encourages the Finnish authorities to ensure the dissemination of all available guidelines for the handling of different forms of violence covered by the Istanbul Convention to all relevant professionals.**

4. Preventive intervention and treatment programmes (Article 16)

81. Perpetrator programmes are important elements of an integrated and comprehensive approach to preventing and combating violence against women. Under Article 16 of the Istanbul Convention, parties are required to set up or support programmes that prevent perpetrators of domestic violence and of sexual violence from reoffending and support them in adopting non-violent behavioural strategies. Making the safety of, support for and the human rights of victims a primary concern, these programmes are key elements in ensuring women's safety from known perpetrators. The convention requires their close co-ordination with specialist support services for victims.

a. Programmes for perpetrators of domestic violence

82. GREVIO's baseline evaluation of Finland had highlighted the necessity to evaluate the efficacy of domestic violence perpetrator programmes provided in custodial settings by the Criminal Sanctions Agency and in non-custodial settings by civil society organisations. GREVIO had also noted inconsistencies in referral processes and promotion strategies for programme participation. In this respect, the baseline evaluation report had acknowledged the benefits of developing and enforcing national standards for domestic violence perpetrator programmes, particularly in identifying referral pathways to enhance programme participation.

83. GREVIO notes with satisfaction that the Finnish authorities have responded to GREVIO's concerns as expressed in the baseline evaluation report. Specifically, in 2022, the Ministry of Justice published the Quality Standards for Violence Prevention and Termination Programmes.⁵⁷ These standards, which apply to perpetrator programmes addressing domestic and sexual violence, set

57. Ministry of Justice, Quality Standards for Violence Prevention and Termination Programmes, 2022, available in Finnish at:

https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/164368/OM_2022_36_ML.pdf?sequence=4&isAllowed=y#.

out the quality criteria for both service providers and the services themselves. Additionally, they provide instructions for law-enforcement, social welfare and criminal sanctions authorities regarding referrals to the available services. Last, the quality standards require the providers to collect information on the provided services and their beneficiaries for evaluation and research purposes. In this regard, GREVIO notes with interest that the Ministry of Justice has tasked the University of Helsinki with carrying out an evaluation of perpetrator programmes. This evaluation will enable the Finnish authorities to assess the effectiveness of current services and address identified shortcomings accordingly. GREVIO points to the need to ensure full implementation of such quality standards and any recommendations for their improvement resulting from the evaluation carried out by the University of Helsinki.

84. Another significant development undertaken by the Finnish authorities pertains to perpetrator programmes conducted within prison facilities. In 2022, the Finnish authorities introduced the Swedish PREDOV programme to be implemented during prison and probation terms. While GREVIO lacks specific data on the current availability of PREDOV in prisons, it acknowledges the initial strides made towards its implementation, such as translating the PREDOV manual and initiating training programmes for facilitators.

85. GREVIO notes that the providers and methods of existing domestic violence perpetrator programmes in non-custodial settings have remained unchanged since the baseline evaluation. These include the Safe Tracks programme offered by the Federation of Mother and Child Homes and Shelters and the NGOs Viola and Lyömätön Linja Espoo. Additionally, the Alternative to Violence programme is available in the Swedish-speaking autonomous region of Åland. A significant challenge in this regard is the centralisation of available services in major urban areas, a concern previously highlighted in the baseline evaluation report. While Lyömätön Linja offers online services for perpetrators that are available country-wide, information provided by civil society organisations indicates that the majority of the country lacks in-person domestic violence perpetrator programmes, resulting in access to assistance often being contingent on geographic location.⁵⁸ GREVIO further notes with concern the absence of culturally appropriate perpetrator programmes provided in Sami languages.⁵⁹

86. As regards the criteria aimed at standardising the quality of services, GREVIO notes the information provided by civil society organisations that indicates varying approaches to co-operation with other relevant stakeholders among service providers.⁶⁰

87. **GREVIO strongly encourages the Finnish authorities to:**

- a. **roll out programmes for perpetrators of domestic violence throughout the country, including by setting up culturally and linguistically appropriate programmes for Sami boys and men and providing them with sustainable funding that is sufficient to ensure their long-term functioning and the ability to retain trained staff;**
- b. **ensure that perpetrator programmes are widely attended, including by incorporating them into the criminal justice system as a tool to reduce recidivism.**

b. Programmes for perpetrators of sexual violence

88. An established treatment programme for persons convicted of sexual violence is the individual-based STEP programme available at Riihimäki prison, which has replaced the group-based STOP programme. This programme is designed for perpetrators categorised as having a high or moderate risk of reoffending and is aimed primarily at reducing recidivism rates. Outside of prison or probation settings, various civil society organisations offer treatment programmes for individuals who have committed or are concerned about committing sexual violence. These initiatives include the Väilitä project by Setlementti Tampere, the SeriE project by Sexpo Prevention

58. Written submission from 25 Finnish NGOs, p. 17.

59. Written submission from the Sami Parliament, p. 2.

60. Written submission from 25 Finnish NGOs, p. 18.

and the ROAD project by the Siltavalmennus association. Participation in both in-prison and external programmes is voluntary.

B. Protection and support

89. Chapter IV of the Istanbul Convention requires a multifaceted, professional and victim-oriented support structure for any woman or girl who has experienced any of the forms of violence covered by the convention. General and specialist support services that are victim-oriented, accessible to all and adequate in numbers greatly facilitate recovery by offering support, protection and assistance in overcoming the multiple consequences of such violence. As such, they play a key role in offering a comprehensive and adequate response to the different forms of violence covered by the convention.

1. General obligations (Article 18)

90. Article 18 of the Istanbul Convention sets out a number of general principles to be respected in the provision of both general and specialist protective and supportive services for women victims of violence. One of these principles is the need for services to act in a concerted and co-ordinated manner, with the involvement of all the agencies concerned. More specifically, Article 18, paragraph 2, of the convention requires parties to put in place appropriate co-ordination mechanisms that can ensure effective co-operation among, *inter alia*, the judiciary, public prosecutors, law-enforcement agencies, local and regional authorities, NGOs and other relevant entities and organisations. In this regard, women's rights NGOs and specialist women's support services play an important role in guaranteeing that the rights of victims are safeguarded in multi-agency co-operation. Other general principles established under this article include the need for measures of protection and support to be based on a gendered understanding of violence against women and to focus on women's safety and human rights, taking into account the relationship between victims, perpetrators, children and their wider environment, and addressing their needs holistically. Specialist support services must aim to ensure the empowerment and economic independence of women victims of violence and avoid their secondary victimisation. This provision equally stresses the importance of ensuring that access to services is not subject to the victim's willingness to press charges or testify against the perpetrator.

91. In its baseline evaluation report on Finland, GREVIO had recognised the efforts of the Finnish authorities in establishing a comprehensive response to domestic violence, including the implementation of restraining orders, multi-agency case conferences (MARACs) and the issuance of guidelines by the Ministry of Social Affairs and Health on domestic violence. However, GREVIO had also noted the absence of protocols for addressing other forms of violence such as FGM, forced marriage and "honour-related violence" while also pointing to the need to introduce specific measures to enhance and promote multi-agency co-operation beyond the use of MARACs at local, regional or national level.

92. GREVIO notes with satisfaction the efforts made in addressing some of these concerns. In 2022, THL released a new guideline for municipalities and well-being services counties, focusing on local and regional co-ordination of prevention of domestic violence and service organisation.⁶¹ While recognising the advantages of the MARAC model, the guidelines afford well-being services counties the discretion to determine the means of multidisciplinary co-operation to assist victims of domestic violence. However, it requires the appointment of a violence prevention co-ordinator in each well-being services county. In this respect, a national network of violence prevention co-ordinators was established in 2023, with representation from all well-being services counties.

93. Despite the efforts of the Finnish authorities to formalise multi-agency co-ordination across local governments, GREVIO notes with concern the persistently fragmented nature of multi-agency co-ordination practices in service provision nationwide. Even though there are currently

61. THL, Instructions for municipalities and well-being services counties for organising co-ordination structures for preventing and combating intimate-partner violence, 2022, available in Finnish at: www.julkari.fi/handle/10024/144538.

40 operational MARACs in Finland, many well-being services counties lack them entirely, while others have multiple MARACs established at the municipal level. Certain cities or municipalities have devised their own formalised multi-agency co-ordination mechanisms as alternatives to MARACs, such as the City of Helsinki's multiprofessional co-operation model for addressing domestic violence, whereas in certain other areas, co-ordination is sporadic and dependent on the initiatives of individual professionals. Women's rights organisations particularly highlight shortcomings in local-level co-ordination mechanisms for directing victims of violence against women to long-term outpatient support services.⁶² Moreover, how MARACs are formed varies significantly, with different authorities leading MARACs in different municipalities/counties. While law-enforcement agencies, social welfare services, healthcare authorities and shelters are consistently integrated into MARACs, GREVIO notes with concern that NGOs providing forms of specialist services other than shelters are not always included. Similarly, certain regions lack one-stop-shop services, such as Barnahus for children and SERI centres for victims of sexual violence, which provide essential support to victims and witnesses of violence against women in a holistic manner.

94. Last, GREVIO notes with regret the lack of multi-agency co-ordination structures at the operational level to address forms of violence beyond domestic and sexual violence, as well as the absence of one-stop-shop services tailored to support their victims.

95. **GREVIO strongly encourages the Finnish authorities to take adequate measures, including legislative measures, to:**

- a. **introduce institutionalised structures for multi-agency co-ordination and co-operation among the different governmental and non-governmental agencies and service providers throughout the country;**
- b. **embed such initiatives in the nationwide policies to respond to all forms of violence against women and domestic violence, based on a gendered understanding and focusing on the human rights and safety of victims, as well as on their empowerment and economic independence;**
- c. **support such institutionalised structures with guidelines and co-operation procedures/protocols for authorities dealing with violence against women and domestic violence, including forced marriage and "honour-related violence", as well as a system for sharing expertise and experience in handling such cases.**

96. **GREVIO further strongly encourages the systematic inclusion of specialist women's support services run by NGOs, and representing victims in multi-agency work, in any formal and informal co-operation structures.**

2. General support services (Article 20)

97. General support services, such as social services, health services and housing or employment services must be equipped to offer support and protection to women victims of gender-based violence of all ages and backgrounds. Article 20 of the convention requires parties to ensure that these services are adequately resourced and that the staff are adequately trained on the different forms of violence against women and are able to respond to victims in a supportive manner, in particular those that women and girls turn to first (health and social services).⁶³ Their interventions are often decisive for victims' onward journey towards a life free from violence and thus a core element of a trust-based system of protection and support.

62. Written submission from 25 Finnish NGOs, pp. 22-23.

63. Explanatory Report to the Istanbul Convention, paragraph 127.

a. Social services

98. GREVIO's baseline evaluation of Finland had revealed substantial shortcomings in the provision of social welfare services tailored to the needs of specific communities, including migrant and Sami women. These had encompassed cultural and linguistic obstacles, a limited understanding of Sami identity and a scarcity of welfare services in rural regions. Additionally, GREVIO had found that differing priorities in resource allocation among local authorities resulted in disparities in support provision.

99. GREVIO acknowledges at the outset the ongoing discussions surrounding austerity measures stemming from the economic crisis within the national political arena of Finland. Women's rights organisations and ombudsperson institutions have communicated their concerns to GREVIO about the planned reduction in public expenditure, specifically highlighting its potential impacts on social welfare services.⁶⁴ These anticipated cutbacks are expected to disproportionately affect women who are victims of violence, hindering their access to vital services and justice. GREVIO stresses that women facing or at risk of intersectional discrimination are particularly vulnerable to the adverse repercussions of these measures. Therefore, the potential ramifications of any forthcoming austerity measures must be evaluated from the perspectives of equality, intersectionality and gender-based violence against women.

100. Concerning long-term support, GREVIO notes that psychosocial counselling is available at crisis centres and family counselling centres in well-being services counties, while economic support and affordable housing services are provided in accordance with the principles of the social welfare state in Finland. However, information received from women's rights organisations reveals that despite the requirement outlined in Section 11 of the Social Welfare Act, which obliges the well-being services counties to maintain adequate and suitable facilities and resources for social welfare activities, numerous counties fail to provide victims with the statutory services they require during or after their shelter period. Consequently, victims of violence, particularly those subject to intersectional discrimination, are unable to establish an independent life and find themselves returning to abusive relationships and shelters repeatedly.⁶⁵ The recurrence of shelter stays without adequate long-term services results in victims' distrust in authorities and services, thereby raising the threshold for victims to seek assistance in the future. According to shelter representatives, it is particularly women without children who encounter greater difficulty in accessing long-term support.⁶⁶ GREVIO further observes a substantial turnover rate among social welfare officers in certain municipalities, which exacerbates victims' reluctance to disclose the violence they have experienced.⁶⁷

101. GREVIO notes with concern gaps in understanding and awareness of specific forms of violence against women within the social welfare system, including among social workers and child-protection officers. These forms include post-separation violence, stalking and the effects of domestic violence on children. Consequently, instances of violence are sometimes mischaracterised as custody disputes, and women seeking to shield their children from abusive fathers are labelled as "difficult" within the social welfare system.⁶⁸

102. Last, GREVIO notes with regret the lack of steps taken to improve the provision of culturally and linguistically appropriate social welfare services for Sami people since the baseline evaluation. Furthermore, in the Sami homeland, public welfare services are concentrated in larger towns, requiring users to travel long distances. This situation presents an additional barrier for Sami women when it comes to reporting violence or seeking assistance from social welfare authorities.⁶⁹

64. Written submission from the Finnish Non-Discrimination Ombudsman, p. 19. Also, information obtained during the evaluation visit.

65. Written submission from 25 Finnish NGOs, p. 23.

66. Information obtained during the evaluation visit.

67. Information obtained during the evaluation visit.

68. Written submission from the NGO VIOLA, p. 2.

69. Written submission from the Sami Parliament, p. 4.

103. **Recalling its findings in the baseline evaluation report, GREVIO strongly encourages the Finnish authorities to establish long-term support services to ensure the recovery of victims from violence and to ensure their economic independence. GREVIO further strongly encourages the Finnish authorities to provide adequate support tailored to the specific needs, rights and circumstances of all victims while acknowledging the need to raise awareness of the various forms of violence against women, overcome language barriers and increase cultural sensitivity towards the specific situations of women from national minorities, for example Sami women.**

b. Healthcare services

104. GREVIO's baseline evaluation had expressed concern regarding the absence of formal obligations for healthcare professionals to co-operate in referring domestic violence victims to appropriate support services, particularly in maternity and child health clinics. Moreover, healthcare professionals had been observed to be hesitant to address issues like FGM due to cultural sensitivities. GREVIO had emphasised the importance of developing protocols and guidelines in the health sector for identifying and assisting victims of violence, as well as enhancing the implementation of existing protocols, including those addressing FGM.

105. GREVIO welcomes the steps taken by the Finnish authorities in the period following the adoption of the baseline evaluation report to enhance the detection of victims of violence against women within the healthcare system. A significant initiative in this regard is the creation of the "Intimate relationship violence filter and survey form" by THL in 2020. This tool aims to identify victims of physical, psychological or sexual domestic violence and guide healthcare professionals in taking appropriate measures based on identified risk factors. These measures may include directing the patient to relevant specialist services, shelters, other healthcare professionals and RIKU as well as forwarding case details to MARACs and alerting child-protection services.

106. Despite these initiatives, information available to GREVIO suggests the need for further efforts to cultivate victims' trust in the healthcare system, thereby encouraging them to disclose experiences of violence against women. According to the 2021 Gender-based Violence in Finland Survey, only 20% of women who had encountered physical violence, sexual violence or threats thereof by their partner reported such experiences to healthcare services.⁷⁰ The National Study on Intimate Partner Femicides⁷¹ also concluded that many victims of femicide had contacted healthcare institutions repeatedly before their deaths. However, in the majority of cases, their visits were not documented as related to violence. According to the Finnish Non-discrimination Ombudsman, these findings highlight a shortcoming in systematic and routine screening of women when they interact with general support services, particularly in healthcare settings.⁷²

107. GREVIO further notes persistent gaps in healthcare professionals' obligations to identify victims of FGM and refer them to appropriate services. Despite the development of tools by THL to assess the risk of FGM and set out actions to be taken in cases where FGM is suspected or where there is a risk,⁷³ information provided by human rights organisations reveals that during pregnancy or after delivery, only five out of 67 women were asked about the risk of FGM to their child.⁷⁴ Additionally, women who have undergone FGM reportedly receive insufficient support and care within the Finnish healthcare system as they often do not receive referrals for reconstructive surgery, primarily due to doctors' lack of knowledge about FGM and available services.⁷⁵

108. In terms of enabling access to healthcare for all victims of violence against women, GREVIO commends the enactment of a law in 2023 expanding the provision of non-urgent

70. Statistics Finland, Gender-based Violence in Finland, 2021, p. 38, available in Finnish at: [Sukupuolistunut väkivalta ja lähisuhdeväkivalta Suomessa 2021: Loppuraportti – Doria](#).

71. University of Helsinki, Intimate partner homicides against women. Preceding events, risk factors and prevention, 2023, available in Finnish at: [www.um.fi/URN:ISBN:978-952-383-133-9](#).

72. Written submission from the Non-discrimination Ombudsman, p. 14.

73. See the available tools on the THL website: [Preventive work and helping those who have undergone FGM – THL](#).

74. Written submission from the Finnish National League of Human Rights, p. 2.

75. Ibid.

healthcare services to migrants with irregular status. Additionally, the law granted women with irregular migration status access to full maternity care and paediatric care. Prior to this change, which came as a result of long-standing advocacy efforts of healthcare professionals, human rights organisations and migrants' rights organisations, Finnish legislation only guaranteed urgent care to migrants with irregular status, which was often narrowly interpreted as emergency care.⁷⁶ GREVIO points to the importance of upholding their access to healthcare, including non-urgent healthcare services, in order to offer an avenue out of abusive relationships, as healthcare professionals often play a crucial role in the detection and protection of victims of violence against women. The exclusion of women with irregular migration status from accessing non-emergency healthcare services would lead to an erosion of their trust in the healthcare system.

109. In more general terms, GREVIO points to the importance of ensuring more standardised screening and documentation of women and girls accessing the healthcare sector for all forms of violence they may be exposed to, including domestic violence.

110. GREVIO encourages the Finnish authorities to intensify their efforts to promote and implement standardised care paths in the public and private healthcare sectors in order to ensure the identification of victims, their diagnosis, treatment, documentation of the type of violence and the violence suffered, and referral to appropriate specialist support services in a gender-sensitive and non-judgmental manner, as well as the provision of a forensic report for victims documenting their injuries.

3. Specialist support services (Article 22)

111. Specialist support services ensure the complex task of empowering victims through optimal support and assistance catered to their specific needs and are an equally important cornerstone of a trust-based system of protection and support. Much of this is best ensured by women's organisations and by support services provided, for example, by local authorities with specialist and experienced staff with in-depth knowledge of gender-based violence against women. They need to be able to address the different types of violence covered by the Istanbul Convention and to provide support to all groups of victims, including hard-to-reach groups.

112. While acknowledging the existence of a number of support services accessible to victims of violence against women, including the telephone helplines Nollalinja and Naistenlinja, shelters, RIKU and other counselling and support services, GREVIO had noted in its baseline evaluation the insufficiency of women-only specialist services that are available throughout the country, including in rural areas and the Sami homeland.

113. GREVIO notes at the outset that the Finnish authorities have undertaken certain measures in response to the concerns outlined in the baseline evaluation. One such initiative involves enhancing the accessibility of the telephone helpline Nollalinja, the nationwide freephone helpline for victims of violence against women and domestic violence, to a broader demographic by introducing interpretation services for eight commonly spoken foreign languages in Finland (Arabic, Dari, Farsi, Somali, Sorani, Russian, Thai and Spanish) in 2020, in addition to Finnish, Swedish and English. Furthermore, a chat service has been implemented on Nollalinja's website that operates in Finnish, Swedish and English on weekdays from 9 a.m. to 5 p.m.

114. Regarding shelters, GREVIO welcomes the steps taken to increase the number and accessibility of available domestic violence shelters. Currently, there are 29 operational shelters in Finland, which collectively provide 235 family places. Among the existing shelters, eight are administered by well-being services counties, while the remainder are managed by NGOs, all of which offer cost-free access to victims of violence against women and their children. GREVIO further notes with interest that in accordance with THL's guidelines, certain shelters offer pet-friendly accommodation for victims who opt not to separate from their animal companions.

76. See a news item announcing the entry into force of the law: www.picum.org/blog/finland-new-law-expands-health-care-undocumented-migrants/.

115. Despite these developments, GREVIO notes with regret that the recommended ratio of one family place per 10 000 inhabitants, as outlined in the Explanatory Report to the Istanbul Convention, has not yet been achieved.⁷⁷ GREVIO further notes with concern that except for MONIKA, which specifically caters for migrant and refugee women, all domestic violence shelters in Finland are accessible to both male and female victims of domestic violence, in accordance with the Act on Shelters for Victims of Domestic Violence. While some shelters are equipped with separate entrances for male and female victims of violence, others feature shared entrances and common areas, such as kitchens and living rooms. GREVIO acknowledges shelter representatives' assurance that the mixed-sex nature of these shelters has not led to security issues thus far, and that women residents have not voiced discomfort regarding sharing spaces with male victims.⁷⁸ Nevertheless, GREVIO highlights the potential deterrent effect that mixed-sex shelters may have on certain women victims of violence in seeking refuge, underscoring the necessity to increase the availability of women-only shelters to address their specific needs and concerns.

116. In light of the aforementioned, GREVIO observes an overall gender-neutral approach to service provision in addressing violence against women in Finland, with only a limited number of specialist services exclusively tailored to women victims of violence and their specific needs. These include Naistenlinja (Women's Line), MONIKA and the rape crisis centre Tukinainen. Nollalinja, serves both women and men, as does RIKU (Victim Support Finland), a general service for victims of crime.

117. GREVIO also notes with concern the inadequacy of support services addressing forms of violence beyond domestic violence. According to the authorities, certain training initiatives have been implemented by the THL to enhance shelter staff's understanding and awareness of various forms of violence, including "honour-related violence", FGM and the digital dimension of violence against women, yet the specifics of these initiatives remain unclear to GREVIO.⁷⁹ GREVIO notes the presence of a number of organisations that offer specialist support for specific forms of violence against women, such as Viola, which provides assistance to victims of stalking. Additionally, various NGOs focus on supporting women with migrant or minority backgrounds who are affected by forced marriage or other forms of "honour-related violence". Nevertheless, these services are not universally accessible throughout the country, posing challenges for women in rural areas to obtain the necessary support when confronted with these particular forms of violence.

118. GREVIO further notes significant shortcomings in the provision of long-term support through specialist services following shelter stays, such as counselling, legal aid and practical assistance, as not all shelters offer non-residential services. A 2022 study by Amnesty International revealed that while acute services for victims of violence were generally deemed adequate, long-term support was found to be lacking. Respondents indicated poor competence in basic services for identifying, addressing and assisting women and girls who have experienced violence. Additionally, there were substantial differences in the availability of long-term support depending on the victim's location, with many respondents citing inadequate mental health services and insufficient staff resources in public services. The capacities of psychiatric outpatient clinics and student healthcare facilities are reported to be strained due to high demand, leading to shortened treatment periods. Furthermore, in

77. Article 23 of the Istanbul Convention requires parties to ensure that there are appropriate, easily accessible shelters in sufficient numbers to provide safe accommodation for women and children. Paragraph 135 of the Explanatory Report to the Istanbul Convention provides guidance to parties on how to assess whether the current number of shelters is sufficient. More specifically, it refers to the Final Activity Report of the Council of Europe Task Force to Combat Violence against Women, including Domestic Violence (EG-TFV (2008)6), which recommends that there should be one family place per 10 000 head of population. A "family place" is defined in the Council of Europe publication "Combating violence against women: minimum standards for support services", EG-VAW-Conf (2007) Study rev., as "an adult plus the average number of children". This notwithstanding, it is important to note that the explanatory report clarifies that the number of shelter places should be adapted to the actual need/demand in the country.

78. Information obtained during the evaluation visit. Furthermore, according to the feedback provided by shelter users, the majority of the victims were highly satisfied with the service, with an overall score of 4.8 out of 5. The shelter users gave the highest ratings to their sense of security during their stay in shelters, for the service and the confidentiality of the service.

79. State report, p. 38.

numerous areas, mental health support in primary healthcare has been curtailed because of workforce shortages.⁸⁰

119. Regarding the accessibility of available services, certain groups of women face particular disadvantages. This is especially evident for Sami women – a concern highlighted in the baseline evaluation report that regrettably remains unaddressed. Despite information from Statistics Finland indicating that as of 2022 each region in Finland had at least one shelter, and that by 2023 all well-being services counties, with the exception of Central Uusimaa, had at least one shelter, there is currently no shelter for victims of violence in the Sami homeland. The nearest domestic violence shelter to the Sami homeland is located in Rovaniemi, hundreds of kilometres away from the farthest point of the Sami homeland. The extensive distances, geographical characteristics of the region and limited public transport connections may hinder Sami victims of violence against women from seeking assistance and shelter. While GREVIO acknowledges the efforts of the Finnish authorities to enhance access for Sami women to the nearest shelter, such as providing a free-of-charge taxi service, it notes that relocating victims to a distant location may disconnect them from their traditional means of livelihood, their communities and the educational rights of their children in Sami languages.⁸¹ According to the Finnish authorities, a call to provide shelter services in the Sami homeland was issued, but no provider, including those from civil society and well-being services counties, stepped forward to offer these services.⁸² Other options were explored, including the possibility of establishing a cross-border shelter service for the Sami people of Norway, Finland and Sweden. However, this proposal was abandoned due to the challenges associated with accommodating the diverse cultural and linguistic requirements of the Sami people across these three countries.⁸³ In addition to shelters, GREVIO also observes a shortcoming in culturally appropriate services in Sami languages. For instance, the national helpline Nollalinja does not offer support in any of the three Sami languages spoken in Finland. Moreover, culturally and linguistically suitable mental health services were solely provided by the Sami psychosocial support unit Uvjj – Uvjâ – Uvja under a fixed-term agreement until the end of 2023. Although the Sami Parliament had proposed the extension of this service beyond 2023, the Finnish authorities have yet to make a decision on the matter.⁸⁴

120. GREVIO welcomes the measures taken by the Finnish authorities to improve the access of women with disabilities to support services for women victims of violence, which were also welcomed by the Committee of the Parties to the Istanbul Convention in its conclusions on the implementation of recommendations in respect of Finland.⁸⁵ These measures included carrying out a disability access audit and providing funding to shelters and other services to address the identified shortcomings in the audit reports. However, GREVIO notes with concern that women with addiction issues face challenges in accessing shelters and currently no shelters in Finland specifically address the needs of this demographic. GREVIO welcomes the government's plans to pilot a "remote shelter" to accommodate victims of domestic violence with addiction issues while facilitating their access to other organisations for specialist services. However, the proposed capacity of three shelter places, with one unit designated exclusively for women victims of domestic violence who have addiction issues will inevitably fall short of meeting the demand.

121. Upon examining the overall landscape of service provision, GREVIO notes a pattern of disparity across regions in Finland, exacerbated by the absence of services tailored to particular groups of women or specific forms of violence, based on a gendered understanding of such violence. It acknowledges, however, the Finnish authorities' recognition of these shortcomings and anticipates that their commitment will lead to tangible improvements in the near future, thereby addressing the gaps in the provision of specialist services nationwide.

80. Amnesty International, "Evaluation of the organisation field: the need for long-term support for women and girls who have experienced violence is not recognised, the services are fragmented and the organisation of services is not resourced", 2022, available in Finnish at: www.amnesty.fi/uploads/2022/08/jokuraja_kyselyraportti.pdf.

81. Written submission from the Sami Parliament, p. 2.

82. Information obtained during the evaluation visit.

83. Information obtained during the evaluation visit.

84. Information obtained during the evaluation visit.

85. Conclusions on the implementation of recommendations in respect of Finland adopted by the Committee of the Parties to the Istanbul Convention, IC-CP/Inf(2023)7, adopted on 1 June 2023.

122. **Recalling the findings issued in GREVIO's baseline evaluation report, GREVIO urges the Finnish authorities to take measures to:**

- a. **increase the number and capacity of women-only shelters providing safe accommodation to victims of all forms of violence against women, in line with the standards set by the Istanbul Convention and in an adequate geographical distribution, with the aim of achieving the standard set in the Explanatory Report to the Istanbul Convention of one family place per 10 000 head of population;**
- b. **ensure that shelters can accommodate and cater for the needs of women subject to intersectional discrimination, including Sami women and women with addiction issues;**
- c. **ensure the availability of immediate, medium and long-term specialist support services, including psychological support to victims of all forms of violence against women, in an appropriate geographical distribution, while catering for the specific needs of vulnerable women subject to intersectional discrimination.**

4. Support for victims of sexual violence (Article 25)

123. Under Article 25 of the Istanbul Convention, parties are required to provide a set of holistic services to victims of sexual violence, including immediate medical care and trauma support, combined with forensic examinations, as well as short and long-term psychological counselling and therapy to ensure the victim's recovery. Such services should be provided by trained and specialised staff in an appropriate manner to respond to the victims' needs, preferably within rape crisis or sexual violence referral centres established in sufficient number throughout the country to ensure their easy access. The recommendation is to set up one of the above-mentioned centres per every 200 000 inhabitants.⁸⁶

124. GREVIO's baseline evaluation report had praised the establishment of SERI sexual violence referral centres for offering comprehensive services to victims of sexual violence while also expressing concern about the 30-day time limit imposed on victims to seek assistance from these services. Additionally, GREVIO had highlighted the need to ensure the nationwide expansion of SERI centres.

125. While the operational framework within which SERI centres serve victims has not changed, GREVIO welcomes the Finnish government's plans to abandon the 30-day time limit for accessing SERI centres, which will also serve to address the CEDAW Committee's concern regarding the potential exclusion of victims of domestic violence from such assistance due to the time limit.⁸⁷

126. In terms of the services provided at SERI centres, GREVIO notes with concern that psychosocial support is not immediately available and limited in terms of duration. Indications received from women's rights organisations suggest psychosocial support is accessible only after a few weeks of applying for the service and, on average, consists of one to three sessions.⁸⁸ The rape crisis centre Tukinainen supplements the services provided by SERI centres, offering long-term psychosocial and legal support to all victims of sexual offences, irrespective of the time elapsed since the violence occurred. Moreover, the option of being able to seek help anonymously lowers the threshold for seeking assistance. However, GREVIO notes that Tukinainen stands as the only rape crisis centre of its kind in Finland, highlighting the absence of such services throughout the country. The overall situation regarding access to rape crisis or sexual violence support services thus raises concern over access to immediate, short and longer-term support and counselling services for women and girls with experiences of sexual violence, in particular whose experiences occurred more than 30 days prior.

86. Explanatory Report to the Istanbul Convention, paragraph 142.

87. CEDAW/C/FIN/CO/8: Concluding observations on the eighth periodic report of Finland, 2022, paragraph 23(g), available at: www.ohchr.org/en/documents/concluding-observations/cedawcfinco8-concluding-observations-eighth-periodic-report.

88. Written submission from 25 Finnish NGOs, p. 24

127. Highlighting the vital nature of the services provided by SERI centres as required under the Istanbul Convention, GREVIO points to the need to ensure sustainable funding for these services in the face of the planned reductions in public expenditure.

128. Last, GREVIO notes that despite the efforts to improve the geographical distribution of SERI centres, women residing in the Sami homeland need to travel to Ivalo or Rovaniemi to access these services, which are several hundred kilometres away from the farthest regions of the Sami homeland. GREVIO welcomes the provision of information about support services for victims of sexual violence that is now available on the THL website in two out of the three Sami languages spoken in Finland.⁸⁹ To address the need for easily accessible, culturally sensitive and linguistically appropriate services for Sami victims of sexual violence in the more remote areas of the country, an interim solution could involve training healthcare professionals in the use of rape kits and the proper procedures for collecting and storing forensic evidence. This approach would facilitate the timely collection of crucial evidence in cases of sexual violence and rape.

129. With a view to further improving the response to sexual violence and rape as well as building the trust of victims in the system, GREVIO strongly encourages the Finnish authorities to:

- a. increase the number of rape crisis centres providing comprehensive and practical support, including immediate, short and long-term psychosocial support for all victims of rape and sexual violence;**
- b. remove any barriers, including the 30-day time limit, to victims' access to the full range of specialist services provided by the SERI centres.**

C. Substantive law

130. Chapter V of the Istanbul Convention covers a range of provisions related to substantive law, in the area of both civil and criminal law, which aim to create the necessary legislative framework to prevent further victimisation of women and girls and to ensure robust intervention and prosecution by law-enforcement agencies. This section focuses on progress made with respect to selected provisions of the convention in the area of substantive law, notably Article 31 on custody, visitation rights and safety and Article 48 on the prohibition of mandatory alternative dispute resolution processes or sentencing in cases of violence against women.

1. Custody, visitation rights and safety (Article 31)

131. Custody and visitation decisions in relation to families with a history of abuse require a careful balancing of the different interests at stake. Article 31 of the convention seeks to ensure that incidents of violence covered by the convention, in particular domestic violence, are taken into account in decisions on custody and visitation rights, to ensure that the exercise of these rights does not harm the rights and safety of the victim or children. This provision contributes directly to their trust in the authorities because it offers essential protection from post-separation abuse.⁹⁰

132. GREVIO's baseline evaluation report had revealed that despite the existence of measures aimed at ensuring safe contact and visitation, district courts tended to refrain from restricting access rights for parents with a history of violence. Expressing concern over the ongoing legislative reform

89. Written submission from the Sami Parliament, p. 3.

90. It is noteworthy that in the case of *Bizdiga v. the Republic of Moldova* (Application No. 15646/18, 17 October 2023), the European Court of Human Rights held that in proceedings concerning the custody and visitation rights regarding children in a domestic violence context, the primary focus must be on the best interests of the child, and an assessment of any risks of violence or other forms of ill-treatment therefore has to form an integral part of such proceedings. For this reason, it found that an alleged history of domestic violence was a relevant and even mandatory factor to be considered in the assessment made by the domestic authorities when deciding on contact rights (§ 62). In the recent case of *Luca v. the Republic of Moldova* (Application No. 55351/17, 17 October 2023), the Court found a violation of Article 8 of the European Convention on Human Rights on account of the failure of the Moldovan authorities to take into account incidents of domestic violence in the determination of child contact rights.

at the time, GREVIO had noted that it did not foresee the prohibition of contact in instances of violence, instead only allowing for supervised or supported visitation. GREVIO had thus highlighted the importance of prioritising the safety of the child above parental access and called for a unified approach among statutory agencies to effectively address domestic violence within custody proceedings.

133. GREVIO notes that the Act on Child Custody and Rights of Access was amended to require family judges to prioritise the protection of children from all forms of violence. Despite this amendment, GREVIO notes with regret that the Finnish law still does not explicitly list domestic violence witnessed by the child, without the child being a direct victim, as a factor to be taken into account in determining custody and visitation rights. In light of the many findings made during its baseline evaluation cycle, GREVIO considers that it is essential, in order to ensure a more effective implementation of Article 31 of the convention, to explicitly include in legislation, as criteria to be taken into account when determining custody and visitation rights, incidents of violence against women, including those witnessed by children.⁹¹

134. GREVIO however notes the growing references to the Istanbul Convention in decisions concerning custody and visitation made by district courts as a welcome development.⁹² Furthermore, GREVIO notes with interest the information relayed by practising judges that although Finnish law does not allow for the withdrawal of parental rights from parents who have perpetrated domestic violence towards the other parent, there have been instances in recent years where courts have imposed complete restrictions on custody and access rights of violent fathers for a specified period, subject to review.⁹³

135. Overall, in practice, the custody and visitation system in Finland appears to prioritise reconciliation and co-operation among parents as the preferred solution, even in cases of domestic violence. According to reports, perpetrators are not directed to amend their violent behaviour patterns; instead, both parents are encouraged to enhance their relationship to promote co-operative parenting.⁹⁴ Ombudsman institutions have expressed concern that during custody and visitation proceedings, the control and abuse experienced by women are disregarded, their need for psychological support and legal aid is not recognised and they are considered equal parties capable of giving informed consent and negotiating with the perpetrator on matters concerning shared assets and children.⁹⁵ A particularly concerning issue raised by various women's rights organisations is that victims often feel unable to raise the issue of domestic violence in court, as attorneys may discourage them from doing so. In proceedings, violence is deemed relevant only when backed by concrete evidence, which proves challenging in cases of psychological violence, coercive control, post-separation violence and stalking, especially in view of the low conviction rates for offences related to these forms of violence.⁹⁶

136. In terms of information exchange between courts and other relevant bodies regarding child custody or access rights, the courts typically solicit a report from the social welfare board as per section 16 of the Act on Child Custody and Right of Access. Various resources have been developed to assist separating parents and relevant authorities in this process. For instance, in November 2021, THL issued guidelines detailing the preparation of such reports, which include instructions for gathering data from various authorities and relevant bodies. Additionally, the Federation of Mother and Child Homes and Shelters has published a handbook entitled "Information and Support for Separating Families with Children", which also offers valuable information and tools for risk assessment for professionals, including judges. However, GREVIO lacks information on the extent to which these tools are used by authorities and judges. In this regard, GREVIO notes the worrying information provided by women's rights organisations, revealing that social welfare authorities or the police often classify post-separation violence and stalking as a "custody battle",

91. Explanatory Report to the Istanbul Convention, paragraph 144.

92. See, for example, the decision H 706/2022/1165 of the Helsinki District Court dated 24 November 2022.

93. Information obtained during the evaluation visit.

94. Written submission from the NGO VIOLA, p. 2.

95. Written submission from the Finnish Non-Discrimination Ombudsman, p. 16.

96. Written submission from 25 Finnish NGOs p. 27, and written submission from the NGO VIOLA p. 1.

especially in cases involving psychological violence and coercive control.⁹⁷ This misclassification may not only deprive the woman and the child of the necessary support but also risks presenting inaccurate information to the courts handling the parental separation case.

137. Looking at custody and visitation proceedings in Finland, GREVIO acknowledges the progress made by the Finnish authorities but notes that the understanding of the convention's requirements in this area still depends on the personal motivation of individual professionals, a fact conceded by the Finnish authorities as well.⁹⁸ This points to a need to put in place risk-assessment and screening mechanisms and to systematically increase the awareness and knowledge of all professionals involved, including judges, court-appointed experts and social and child-protection services, on the dynamics of domestic violence as well as the harmful effects of a child's exposure to physical, sexual or psychological violence and abuse between parents or other family members.⁹⁹ GREVIO recalls in this respect that that joint parenting in cases of domestic violence allows perpetrators to maintain their control and dominance over the mother and children.

138. Recalling the findings issued in GREVIO's baseline evaluation report, GREVIO urges the Finnish authorities to:

- a. ensure that the negative impact that violence against women has on children is reflected in legislation, and that incidents of violence against women are a mandatory legal criterion to be taken into account when deciding on custody and visitation rights;**
- b. take measures to incorporate a systematic screening and risk-assessment process in cases concerning the determination of custody and visitation rights to establish whether violence has been an issue in the relationship.**

2. Prohibition of mandatory alternative dispute resolution processes or sentencing (Article 48)

139. Article 48, paragraph 1, of the Istanbul Convention requires parties to prohibit the mandatory participation in any alternative dispute resolution processes, including mediation and conciliation, in relation to cases of all forms of violence against women covered by the convention. This provision stems from the principle that violence against women is a manifestation of unequal power relations and that victims of such violence can never enter the alternative dispute resolution processes on an equal footing with the perpetrator. To avoid the re-privatisation of such violence and to enable the victim to seek justice, it is the responsibility of the state to provide access to adversarial court proceedings on the basis of robust criminal and civil law provisions.

140. In Finland, voluntary mediation is an option available in both criminal proceedings and parental separation proceedings under civil law. In criminal cases, mediation may be proposed to the involved parties by law enforcement or the public prosecutor and is carried out by trained mediators under the supervision of THL. Once mediation procedures are initiated, criminal investigation and prosecution are suspended until the mediation is concluded. This finalisation can occur as a result of a mediation agreement, the failure of the parties to reach an agreement or the interruption of the mediation for another reason. Upon reaching an agreement, ongoing criminal investigation or prosecution may be waived at the discretion of the investigating or prosecuting authorities if the proceedings and sanctions are deemed unreasonable or inappropriate. However, if the perpetrator fails to fulfil the obligations set out in the agreement, criminal prosecution may resume. Furthermore, when the case is already before the criminal courts, under Chapter 6, section 6, of the Criminal Code, mediation between the victim and the perpetrator is deemed as grounds for reducing the punishment. This provision does not require the conclusion of a mediation agreement; the offender's attempt to reach a settlement is also considered grounds for reducing the sentence, even if an agreement is not reached.

97. Ibid.

98. State report, p. 42.

99. Explanatory Report to the Istanbul Convention, paragraph 143.

141. GREVIO's baseline evaluation had criticised the absence of clear protocols and guidelines in criminal mediation of domestic violence cases, noting that mediation frequently resulted in the discontinuation of criminal proceedings or reduced sentences. GREVIO's findings had called for the exclusion of repeated domestic violence cases from criminal mediation and the reconsideration of the police's authority to propose mediation, given its potential adverse impact on the effectiveness of criminal investigations.

142. GREVIO welcomes the fact that in the period following the baseline evaluation report, criminal mediation of domestic violence was extensively discussed in Finland. The Ministry of Justice has established a working group with a mandate to promote the use of mediation, including an assessment of its ongoing applicability in domestic violence cases. In its report dated 25 May 2023, this working group stressed that in mediation practices particular attention needs to be paid to repeated and serious domestic violence.¹⁰⁰ Additionally, the Prime Minister's Office commissioned a study to examine the general characteristics of mediation in domestic violence cases and the experiences of the involved parties.¹⁰¹ The study revealed a generally positive picture of the mediation process. Most participants who responded to either interviews or surveys said that they were well informed about mediation, without experiencing any coercion to participate. The majority of the participants found the sessions beneficial, reporting a reduction or cessation of violence in a significant proportion of cases. As per the study, between 2020 and 2021, 43% of mediation proposals for domestic violence cases were declined by mediation offices, with nearly half of the rejections attributed to one party's reluctance to participate. Additionally, mediation was halted in 15% of cases after the process had commenced.

143. GREVIO particularly welcomes the issuance of a directive by the National Police Board instructing that criminal cases stemming from repeated domestic violence should not be referred to mediation. Additionally, in 2023, THL introduced a good practice model for the mediation of intimate-partner violence. These guidelines provide recommendations to mediators, to aid the assessment of essential factors such as the perpetrator's readiness to acknowledge accountability, the parties' motivation and voluntary participation, and the gravity of the violence and whether it is recurrent. GREVIO notes the guidelines' stance that recurrent instances of domestic violence are unsuitable for mediation, while also recognising the challenges in defining what constitutes repetition. The guidelines thus propose establishing a separate, cross-administrative working group to precisely set out the criteria for repetition.¹⁰²

144. However, despite the Finnish authorities' efforts to ensure voluntariness and deter the referral of repeated instances of domestic violence to mediation, information conveyed to GREVIO suggests that severe and recurrent cases of domestic and sexual violence continue to be directed to mediation in Finland. According to women's rights organisations, this issue is attributed to the inadequacy of knowledge and skills among the police force to accurately discern what cases are suitable for mediation.¹⁰³ Furthermore, in practice, the referral of cases of violence to mediation disrupts the criminal proceedings, as mediation agreements often result in a decision not to pursue prosecution.¹⁰⁴ The CEDAW Committee had also expressed concern that mediation in cases of intimate-partner violence persists in Finland and is reportedly on the rise. It thus recommended prioritising prosecution over mediation in such cases and ensuring that referral to mediation does not halt criminal investigation and prosecution.¹⁰⁵ The information provided by the Finnish authorities contests this assessment, indicating that the number of cases directed to mediation remained relatively stable between 2020 and 2022, with 2 669 cases in 2020 and 2 663 cases in 2022.

100. Ministry of Justice, "Mediation situation and development needs in the administration of the Ministry of Justice: Recommendations of the working group promoting mediation", 2023, available in Finnish at: www.julkaisut.valtioneuvosto.fi/handle/10024/164965.

101. Mediation in close relationship violence: General features and experiences of the parties in the process, 2023, available at: www.julkaisut.valtioneuvosto.fi/handle/10024/164663.

102. THL, A good practice model for mediation of intimate partner violence, 2023, p. 18, available for download at: www.julkari.fi/bitstream/handle/10024/147378/URN_ISBN_978-952-408-160-3.pdf?sequence=1&.

103. Written submission from 25 Finnish NGOs, p. 29.

104. Ibid.

105. CEDAW/C/FIN/CO/8: Concluding observations on the eighth periodic report of Finland, 2022, paragraph 24(b), available at: www.ohchr.org/en/documents/concluding-observations/cedawcfinco8-concluding-observations-eighth-periodic-report.

145. While GREVIO acknowledges the stagnation in the number of cases directed to mediation based on the figures provided by the authorities, it reiterates its concern, as expressed in the baseline evaluation, that the authorities responsible for proposing mediation in domestic violence cases remain the law-enforcement authorities and prosecution services and that this continues to result in the pausing of criminal investigations at a critical stage. This may lead to deficiencies in conducting an effective investigation and the loss of often time-sensitive, vital evidence. GREVIO underlines that effective investigation, prosecution and dissuasive sanctions constitute essential elements of the prosecution pillar of the Istanbul Convention. It thus emphasises the essential role of police officers and prosecutors in ensuring an effective criminal justice response to domestic violence and ensuring women's access to justice. GREVIO further notes with concern that, in light of the ongoing understaffing issues experienced by Finnish law enforcement,¹⁰⁶ directing victims to mediation may risk being motivated by a desire to alleviate the police force's caseload.

146. In light of the above, GREVIO welcomes the inclusion in the Government Programme of plans to exclude domestic violence cases from criminal mediation as a rule. It notes that a proposal for legal amendment is scheduled to be presented to parliament during the autumn of 2024.

147. In civil matters, parties must apply to district courts on their own initiative for mediation, where it is conducted by a judge with support from a psychologist or social worker.¹⁰⁷ Regarding expert-assisted mediation of custody and visitation disputes by the courts, GREVIO notes with regret the absence of criteria for the suitability of the cases, screening and risk-assessment processes for domestic violence and the absence of information on safeguards in place. An information brochure on the mediation of custody disputes outlines several advantages, including affordability and expediency, without addressing the risks associated with mediation in cases of separation with a history of domestic violence.¹⁰⁸ Women's rights organisations have cited the length and expense of legal proceedings as reasons why victims resort to court-assisted mediation in custody disputes,¹⁰⁹ as no other alternatives are accessible for financial reasons.¹¹⁰

148. In support of the ongoing efforts to ensure the voluntary nature of mediation in criminal and civil law in connection with violence against women, GREVIO strongly encourages the Finnish authorities to pursue the planned legislative amendments aimed at excluding domestic violence cases from mediation. In the interim, GREVIO urges the Finnish authorities to take measures to ensure that initiation of mediation procedures does not result in the premature discontinuation of criminal investigations and incomplete collection of evidence. In this regard, and recalling its finding from the baseline evaluation report, GREVIO urges the Finnish authorities to reconsider the power vested in the police to propose mediation as a criminal justice measure in domestic violence cases, in order to ensure the effectiveness of criminal investigations and thereby maintain victims' trust in the system and their ability to access justice.

D. Investigation, prosecution, procedural law and protective measures

149. Full accountability for all acts of violence against women requires an adequate response from law-enforcement agencies and the criminal justice sector. Chapter VI of the Istanbul Convention establishes a set of measures to ensure criminal investigations, prosecutions and convictions in a manner that validates women's and girls' experiences of violence, that avoids their secondary victimisation and that offers protection throughout the different stages of proceedings. The provisions covered in this section are fundamental to the delivery of protection and justice for all women and girls at risk of or who have experienced gender-based violence.

106. See Article 49, General obligations, and Article 50, Immediate response, prevention and protection.

107. See the information on expert-assisted mediation of custody disputes at the district court on the Finnish Court Administration's website: www.oikeus.fi/tuomioistuimet/en/index/asiat/perheasiat/lapsenhuoltoasuminenelatusjatapaamin/en/expert-assistedmediationofcustodydisputesatthedistrictcourt.html.

108. Brochure on mediation of custody disputes at the district court, available at: www.oikeus.fi/material/sites/oikeus_tuomioistuimet/liitteet/jy1j8dims/Huoltoriidan_sovittelu_esite_EN.pdf.

109. See Article 48, Prohibition of mandatory alternative dispute resolution processes or sentencing.

110. Written submission from 25 Finnish NGOs, p. 26.

1. General obligations (Article 49) and Immediate response, prevention and protection (Article 50)

150. A key principle of an adequate response to violence against women is that of swift and effective investigations and judicial proceedings that are based on a gendered understanding of these types of offences and that take into consideration the rights of the victim during all stages. Those in law enforcement or the judiciary often do not prioritise incidents of violence against women and domestic violence, thereby contributing to the impunity of perpetrators and reinforcing the misconception that this type of violence is “acceptable” in society.¹¹¹ A consequence of assigning low priority to incidents of violence against women and domestic violence are delays in initiating investigations and judicial processes, which in turn may lead to the loss of vital evidence and to an increased risk for the victim of repeated violence. For these reasons, Article 49 of the convention requires parties to ensure that investigations and judicial proceedings are conducted without undue delay, while at the same time respecting the rights of victims during each stage of these processes. Article 50 further reinforces these obligations by requiring that law-enforcement agencies react promptly and appropriately in cases of violence against women, including by offering victims immediate protection and by engaging in the prevention of violence. GREVIO reports focus on the application of Article 50 at key stages of the criminal justice process, notably reporting, investigation, prosecution and conviction, all of which are key contributors to victims’ sense of support, protection and justice.

a. Reporting to and immediate response and investigations by law-enforcement agencies

151. In its baseline evaluation report, GREVIO had noted a range of concerns as regards police attendance at incidents of domestic violence, such as lack of in-person attendance, the prioritisation of physical evidence and inadequate training in handling cases of domestic violence and “honour-related”.

152. While some measures are being taken to address these concerns, notably the introduction of online reporting methods and more training initiatives, GREVIO notes that victims in Finland rarely turn to the police for help, suggesting continuously low levels of confidence and/or trust placed in the handling of their cases. The 2021 Gender-based Violence Survey revealed that merely 11% of women subjected to physical or sexual violence, or threats thereof, by an intimate partner, opted to report these incidents to law enforcement. The data also indicate that the reporting rates only marginally increased when the violence was recurrent. Accordingly, when instances of domestic violence were repeated, 14% of women chose to report it to law enforcement.¹¹² Moreover, reporting rates varied across different forms of violence: 12% of victims of physical violence reported it to the police, while for victims of sexual violence perpetrated by a current or intimate partner, the reporting rate was 18%. Similarly, victims of stalking had a reporting rate of 17%. However, only 4% of women who experienced sexual violence from an unknown perpetrator reported it to the police.¹¹³ These data suggest that gender-based violence against women remains significantly under-reported in Finland, although an increase in reported cases of domestic violence has been visible since 2021. GREVIO points to the potential correlation of this increase with the Covid-19 pandemic and notes with interest the ongoing study by THL on the effects of the coronavirus epidemic on experiences of domestic violence and the use of services.¹¹⁴

153. The introduction of a consent-based definition of rape in 2023, however, seems to be boosting reporting numbers for sexual offences, which GREVIO welcomes. Although GREVIO did

111. Explanatory Report to the Istanbul Convention, paragraph 255.

112. Statistics Finland, Gender-based Violence in Finland, 2021, p. 38, available in Finnish at: [Sukupuolistunut väkivalta ja lähisuhdeväkivalta Suomessa 2021: Loppuraportti – Doria](#).

113. *Ibid.*, p. 69.

114. THL, Impacts of the coronavirus epidemic on experiences of domestic violence and the use of services (KOVÄ) – information on this ongoing study is available at: www.thl.fi/en/research-and-development/research-and-projects/impacts-of-the-coronavirus-epidemic-on-experiences-of-domestic-violence-and-the-use-of-services-kova-.

not have the opportunity to assess the entirety of the criminal justice system's response to the new legislation due to its early stages of implementation, it nonetheless views the rise in reports of sexual violence – up to 7 100 recorded cases, indicating a 29.6% increase from the preceding year – as a sign of women's experiences of sexual violence and rape as being recognised as criminal behaviour and thus an element of progress towards building their trust in the criminal justice system.

154. In view of the above, GREVIO welcomes various initiatives aimed at enhancing the police response to violence against women. For instance, the police have developed and modernised their electronic services to facilitate the reporting of crimes. According to information provided by the authorities, about half of all crime reports made to the police are done through the police's website. Another notable initiative is the establishment of the USEL victim, mediation and restraining order network in 2019. This network is designed to enhance police expertise in matters concerning the rights of crime victims, mediation and restraining orders through collaboration with other authorities and organisations. While these networks do not directly intervene in specific cases, they facilitate practitioner collaboration and serve as a training platform. The underlying objective is to reduce the burden on victims and minimise the need for multiple interactions with various bodies. GREVIO notes this initiative with interest; however, it lacks information on whether the USEL network has developed specialised working methods and tools specifically tailored to facilitating co-ordination in cases of violence against women. Moreover, there remains a lack of clarity about the nationwide coverage and operational effectiveness of the USEL networks.

155. With regard to resources allocated to law-enforcement agencies, GREVIO observes that Finland maintains the lowest number of police officers per capita in the EU. Currently, there are approximately 7 500 active officers, with plans underway to increase this figure to 8 000 within the next four years. Despite this, GREVIO acknowledges the progress made in increasing the proportion of female officers to 30%, compared to 15% at the time of the baseline evaluation. GREVIO also recognises the Finnish authorities' efforts to enhance information provision to victims regarding their right to request a female police officer. This aspect was also investigated by the USEL networks, revealing that in cases of domestic violence, women victims expressed a preference for being interviewed by a male police officer.¹¹⁵

156. Regarding specialisation on violence against women and the promotion of a trauma-informed response, GREVIO observes discrepancies across different police districts in Finland. While some main stations may house specialised units focused on violence against women, smaller stations may have specialised officers within general violent crime departments.¹¹⁶ This differentiation was attributed to the necessity for police in smaller areas to be equipped to handle various types of crimes. GREVIO was also informed that only police officers attending victim interviews receive training in trauma-informed response. However, this training is not specifically tailored to address violence against women; instead, it is integrated into cross-cutting courses, such as those on responding to home calls.¹¹⁷

157. GREVIO thus notes with concern that a 2022 report by the Deputy Chancellor of Justice highlighted a lack of essential skills and knowledge to identify the characteristics of sexual and domestic violence as well as the capacity to accurately assess the severity of these offences.¹¹⁸ In this respect, GREVIO notes with grave concern that certain cases of non-fatal strangulation have been classified as mild assault by law-enforcement agencies.¹¹⁹ GREVIO stresses that strangulation is a particularly dangerous form of physical violence, as research indicates that victims of prior strangulation are seven times more likely to later become victims of murder¹²⁰ and that strangulation

115. Information obtained during the evaluation visit.

116. Information obtained during the evaluation visit.

117. Information obtained during the evaluation visit.

118. Deputy Chancellor of Justice, Police procedure in preliminary investigations of intimate partner violence and sexual Crimes, 2022, available in Finnish at: www.oikeuskansleri.fi/-/poliisin-menettely-lahisuhdevakivallan-ja-seksuaalirikosten-esitutkinnoissa.

119. *Ibid.*, p. 29.

120. Glass N., Laughon K., Campbell J., Block C. B., Hanson G., Sharps P. W. and Taliaferro E., "Non-fatal Strangulation is an important risk factor for homicide of women", *The Journal of Emergency Medicine*, Volume 35, Issue 3, 2008, pp. 329-335, available at: www.ncbi.nlm.nih.gov/pmc/articles/PMC2573025/.

is one of the most common methods of killing in domestic violence settings.¹²¹ Strangulation – the obstruction of blood vessels and/or airflow by external (often manual) pressure to the neck – causes decreased oxygen supply to the brain and can lead to unconsciousness and the loss of bladder control within 7 to 15 seconds.¹²² If not fatal, it is likely to cause serious permanent injuries, such as brain damage, as well as extreme distress to victims, who commonly feel like they are about to die.¹²³

158. Moreover, information obtained from members of civil society indicates that police often fail to recognise “honour-related violence”, particularly in smaller cities. This lack of recognition also extends to informing victims of their rights. Additionally, the lack of interpretation services for migrant women hinders their access to justice. Reportedly, there have been instances where women were unable to report incidents at certain police stations due to the absence of interpretation services.¹²⁴ Similarly, reports indicate that digital violence against women is not consistently regarded as serious, and resources are not consistently allocated to its investigation. Shortcomings in evidence gathering in cases of online and technology-facilitated violence against women place the burden on the victim to ensure the securing of evidence.¹²⁵

159. Recalling the findings issued in GREVIO’s baseline evaluation report, GREVIO urges the Finnish authorities to equip all relevant law-enforcement authorities with the resources, knowledge and skills to respond promptly and appropriately to every report of violence covered by the Istanbul Convention, including their digital manifestations, in particular by systematically integrating a gender-sensitive and trauma-informed understanding of all forms of violence against women into police procedures.

b. Effective investigation and prosecution

160. In its baseline evaluation report GREVIO had expressed concern about significant attrition rates in domestic violence and rape cases. It had noted that only a fraction of reported cases were officially recorded, and even fewer progressed to prosecution. GREVIO had identified the factors contributing to this attrition, such as the quality of police investigations and the force-based definition of rape, which required evidence of violence for successful prosecution. Similarly, GREVIO had highlighted the high evidentiary threshold for “honour-related violence”.

161. At the outset, GREVIO welcomes the 2023 report on the progression of violent crimes against women in the criminal process, conducted by Statistics Finland and published by the Ministry of Justice. This report offers valuable insights into the treatment of cases involving violence against women within the criminal justice system. Accordingly, in the years 2020, 2021 and 2022 respectively, 4 048, 3 934 and 4 279 incidents of intimate-partner violence against women were reported to the police. Around 80% of these reports were forwarded for prosecution. Out of these cases, 938, 956 and 919 were concluded with a decision not to pursue prosecution as no crime was deemed to have been committed.¹²⁶ The analysis indicated a significant decrease since 2011 in the use of rationales such as “the victim does not demand punishment” and “victim has withdrawn the claim” by the police to discontinue investigations, since mild assaults in close relationships became subject to *ex officio* prosecution in 2011.¹²⁷

121. See, for example: www.femicidecensus.org/reports/ for data from the UK.

122. These time spans are commonly accepted in the medico-legal field, and were first examined in a study from 1943: Kabat H. and Anderson J. P., “Acute Arrest of Cerebral Circulation In Man: Lieutenant Ralph Rossen (Mc), U.S.N.R.”, *Arch NeurPsych.*, 1943; 50(5): 510-528, available at: www.jamanetwork.com/journals/archneurpsyc/article-abstract/649750.

123. White C., Martin G., Schofield A. M. and Majeed-Ariss R., “‘I thought he was going to kill me’: Analysis of 204 case files of adults reporting non-fatal strangulation as part of a sexual assault over a 3 year period”, *Journal of Forensic and Legal Medicine*, Volume 79, 2021, available at: www.sciencedirect.com/science/article/abs/pii/S1752928X21000135.

124. Information obtained during the evaluation visit.

125. Written submission from 25 Finnish NGOs, p. 31.

126. Statistics Finland, Report on the progression of violent crimes against women in the criminal process, 2024, pp. 11-21, available in Finnish at: www.julkaisut.valtioneuvosto.fi/handle/10024/165439.

127. Accordingly, in 2010, approximately 16% of women victims of domestic violence did not demand punishment, whereas in 2022 this ratio was slightly more than 2%. In 2010, approximately 14% of domestic violence victims had withdrawn their claim compared to 2% in 2022.

162. While welcoming this progress, GREVIO notes that an important proportion of the reported incidents of domestic violence are not transmitted for prosecution, and the reasons remain unclear. GREVIO notes that victims' withdrawal of or change in their initial testimony was cited as one possible factor.¹²⁸ According to the authorities, the heavy reliance on the victim statement is mitigated by efforts to secure corroborating evidence, such as photographic evidence, shelter records and witness testimonies. To address the challenges posed by over-reliance on victim's testimony, prosecution authorities may also request the courts to waive spousal privilege. If accepted, this action would make the victim's initial police statement available to the courts, which is otherwise confidential.¹²⁹ GREVIO also notes with interest that according to a recent decision by the Supreme Court, medical reports may now be accepted as evidence in violence against women cases, whereas previously they were deemed inadmissible.¹³⁰

163. GREVIO further stresses that the data provided in the report on the progression of cases in the criminal process pertain solely to domestic violence cases, specifically assaults and attempted murders. Due to the shortcomings in Finland's administrative data-collection systems,¹³¹ without a comprehensive study analysing the criminal justice response to various forms of violence against women it is impossible to discern the reporting and prosecution rates concerning other forms of violence against women covered by the Istanbul Convention, including those perpetrated by third parties. GREVIO notes with regret this lack of information and regards it as a missed opportunity to identify and address shortcomings in the prosecution of various forms of violence against women.

164. A major shortcoming in the prosecution of cases of violence against women, as identified by ombudsperson institutions and women's rights organisations, is the length of investigations and prosecutions. In his report, the Deputy Chancellor of Justice found that, after independently examining 77 pending or completed preliminary investigations into sexual and domestic violence by the police, numerous investigations had been unnecessarily delayed across various police districts in such cases.¹³² GREVIO notes with grave concern that in several cases the right to prosecution had expired as a result. As the Deputy Chancellor of Justice also highlighted, when unjustified delays in pretrial investigations lead to them becoming time-barred, this affects the victims' trust in the police.¹³³ Many of these delays were purportedly caused by lack of resources. However, the Deputy Chancellor of Justice found that in many cases, the resources were poorly organised and no oversight had been conducted on the process. GREVIO stresses that undue delays in investigations expose victims of violence against women to re-traumatisation and erode their trust in the criminal justice system.

165. GREVIO urges the Finnish authorities to take all necessary measures to ensure that investigations into all forms of violence against women covered by the Istanbul Convention are conducted without undue delay, and that investigating authorities proactively collect evidence beyond the victim's statement in order to ensure effective and timely prosecution, including in the context of the newly introduced consent-based legal provision and digital manifestations of violence against women.

c. Conviction rates

166. GREVIO notes that the organisation of courts in Finland may result in divergent approaches to addressing violence against women depending on the region where the court is situated. Specifically, among the 20 district courts in Finland, larger ones have the capacity to establish specialised courts dedicated to handling domestic and sexual violence cases, while smaller courts lack the ability to create such specialisation.

128. Information obtained during the evaluation visit.

129. Information obtained during the evaluation visit.

130. Decision of the Finnish Supreme Court, KKO:2021:73, 11 October 2021.

131. See Article 11, Data collection and research.

132. Deputy Chancellor of Justice, Police procedure in preliminary investigations of intimate partner violence and sexual Crimes, 2022, pp. 57-58, available in Finnish at: www.oikeuskansleri.fi/-/poliisin-menettely-lahisuhdevakivallan-ja-seksuaalirikosten-esitutkinnoissa.

133. Ibid.

167. In terms of conviction rates, GREVIO notes with regret the unavailability of such data disaggregated by year and specific forms of violence against women, along with the lack of information on sanctions imposed for different forms of violence. Nevertheless, the study on the progression of violence against women cases in the criminal process offers some insights into court conviction and sanctioning practices, despite its collective scope covering the period 2019-2022. Between 2019 and 2022, district courts or courts of appeal handled a total of 27 200 cases involving domestic assault or attempted murder against women. The majority (about 23 000) concerned simple assault, while 1 800 were aggravated assault. Among simple assault cases resulting in a sentence, in 58% of cases the perpetrators received fines, nearly a third were given a suspended custodial sentence and 12% were sentenced to imprisonment. Aggravated assaults and attempted murders often led to imprisonment. GREVIO notes with concern the fact that in 42% of cases of aggravated assault, sentences were suspended, and that attempted gender-related killings of women had higher rates of non-conviction compared to other forms of violence, often due to a defendant's lack of criminal responsibility.¹³⁴ Overall, 87% of the charges concerning all forms of violence subject to the study resulted in conviction, with the lowest conviction rate for attempted murder, 77%.¹³⁵ Although limited, these data suggest the ineffectiveness of sanctions in deterring domestic violence, particularly in cases deemed less severe by the criminal justice system.

168. Last, delays in case processing remain a significant problem once cases are transferred to the courts. Statistics Finland's report on the progression of violence against women cases in the criminal process indicates that between 2019 and 2022, it took an average of 346 days from the initial reporting of the crime to the court's decision.¹³⁶ However, according to legal experts in the field, the delays can be much longer, effectively deterring victims from bringing the violence to the attention of criminal justice authorities in order to avoid enduring years of emotional turmoil.¹³⁷

169. **GREVIO urges the Finnish authorities to:**

- a. take measures to identify and address all factors contributing to the high levels of attrition in criminal justice proceedings in relation to cases of violence against women covered by the Istanbul Convention, including the reasons for delays in such proceedings, in order to ensure, by legislative and other measures, greater accountability of perpetrators;**
- b. take sustained measures to reinforce the capacity of courts that hear cases of violence against women so as to reduce delays;**
- c. ensure that sentences and measures imposed for the offences covered by the Istanbul Convention are effective, proportionate and dissuasive.**

2. Risk assessment and risk management (Article 51)

170. Many perpetrators of domestic violence, rape, stalking, sexual harassment, forced marriage and other forms of violence covered by the Istanbul Convention threaten their victims with serious violence, including death, and have subjected their victims to serious violence in the past, including non-fatal strangulation. The growing digital dimension of such violence further exacerbates women's and girls' sense of fear. Article 51 thus places concern for their safety at the heart of any intervention in such cases by requiring the establishment of a multi-agency network of professionals to protect high-risk victims without aggravating the harm experienced. It sets out the obligation to ensure that all relevant authorities, not just law-enforcement authorities, effectively assess and devise a plan to manage the safety risks a victim faces, on a case-by-case basis, according to standardised procedures and in co-operation with each other.

134. Statistics Finland, Report on the progression of violent crimes against women in the criminal process, 2024, pp. 30-31, available in Finnish at: www.julkaisut.valtioneuvosto.fi/handle/10024/165439.

135. Ibid.

136. Ibid.

137. Information obtained during the evaluation visit.

171. GREVIO's baseline evaluation had highlighted concerns regarding the inconsistent use of risk-assessment and risk-management measures within MARAC groups, with law-enforcement agencies being notably less inclined to refer cases to MARACs.

172. GREVIO acknowledges the effectiveness of the MARAC system for conducting thorough risk assessments through the use of the DASH questionnaire and for establishing a comprehensive risk-management framework involving multiple stakeholders. GREVIO notes with satisfaction that the DASH questionnaire used in Finland considers previous incidents of non-fatal strangulation, among other factors, as an indicator of risk.¹³⁸ While also recognising the steps taken to improve the MARAC network throughout Finland, with over 40 local or regional MARAC groups in operation by the beginning of 2023, GREVIO observes that certain regions or municipalities, such as the City of Helsinki, do not yet have a MARAC system in place. This is particularly concerning given that the City of Helsinki has the highest incidence of violence against women, attributed to its large population and complex demographic composition. While GREVIO acknowledges that the City of Helsinki has implemented its own multi-agency co-operation mechanism,¹³⁹ according to the authorities' own admission, this system primarily establishes referral pathways but lacks an integrated mechanism for systematically assessing the risks of repeated or escalated violence.¹⁴⁰

173. Furthermore, where MARACs are established, GREVIO observes that they are not fully made use of. A study commissioned by the Government Office, examining the sequence of events leading to gender-related killings of women, revealed that the proportion of victims referred to MARACs is considerably low compared to those seeking assistance from shelters or the number of domestic violence cases reported to the police.¹⁴¹ Moreover, the majority of referrals to MARACs originate from domestic violence shelters or social welfare professionals. However, as noted in GREVIO's baseline evaluation report, the referral of victims to MARACs by law-enforcement and healthcare professionals remains insufficient.¹⁴²

174. This lack of consistency in approaches to risk assessment and management leads to certain serious incidents being overlooked. In a worrying example documented in 2019, the Deputy Chancellor of Justice found in one particular case that despite the occurrence of repeated violence, the police failed to conduct a risk assessment, neglected to inform the victim about accessible support services, did not evaluate the necessity for a temporary restraining order and failed to collaborate with other authorities.¹⁴³

175. While THL strives to promote the establishment of MARACs and standardise their operational procedures, including by providing guidelines to local authorities for preventing and addressing domestic violence,¹⁴⁴ the absence of binding legislation means that the fragmented approach to risk assessment in Finland is likely to persist.

176. Last, GREVIO notes with regret the absence of risk-assessment procedures for forms of violence other than domestic violence in Finland. In this regard, GREVIO points to established standardised systems such as the Stalking Assessment and Management (SAM) system for stalking and the Assessment of Risk for Honour-Based Violence (PATRIARCH) system for "honour-related violence", highlighting that they can serve as models for implementation.

138. University of Helsinki, *Intimate partner homicides against women. Preceding events, risk factors and prevention*, 2023, p. 26, available in Finnish at: www.urn.fi/URN:ISBN:978-952-383-133-9.

139. See Article 18, General obligations.

140. Information obtained during the evaluation visit.

141. University of Helsinki, *Intimate partner homicides against women. Preceding events, risk factors and prevention*, 2023, p. 96, available in Finnish at: www.urn.fi/URN:ISBN:978-952-383-133-9.

142. *Ibid.*, p. 90.

143. Deputy Chancellor of Justice, Case OKV/1325/1/2018, 2019.

144. THL, *Instructions for municipalities and well-being services counties for organising co-ordination structures for preventing and combating intimate partner violence*, 2022, available in Finnish at: www.julkari.fi/handle/10024/144538.

177. **GREVIO strongly encourages the Finnish authorities to take legislative and other measures to ensure that a standardised and gender-sensitive risk-assessment and safety-management procedure is used systematically throughout the country in all cases of violence against women covered by the Istanbul Convention.**

3. Emergency barring orders (Article 52)

178. Under Article 52 of the Istanbul Convention, in situations of immediate danger, the authorities are granted the power to issue an emergency barring order, ordering the perpetrator to leave the residence of the victim or person at risk for a specific period of time, and to prohibit the perpetrator from entering the residence or contacting the victim or person at risk. Emergency barring orders are tools intended to prevent a crime and to put safety first.¹⁴⁵ They should therefore be time-bound and incident-based, with the possibility of renewal in the case of continued danger. Longer-term protection should, however, be granted by a court by means of a protection order, upon application by the victim. An emergency barring order should in principle extend to children in need of protection and should have immediate effect.

179. GREVIO welcomes the enactment by the government in 2022 of a legislative reform aimed at addressing the baseline evaluation's findings on emergency barring orders, which had pointed to the need to make emergency barring orders accessible to victims in less permanent living arrangements with their intimate partners, authorise all responding officers to issue emergency barring orders *ex officio* and promote increased use of such orders. GREVIO notes that the issuance of "inside-the-family restraining orders", which may include removal from the residence, remains within the purview of civil servants with powers of arrest, such as senior police officers, prosecutors and district courts, with patrol officers still lacking this authority. Nevertheless, recent legislative changes have eased the criteria for their *ex officio* implementation. Previously, victims seeking protection had to demonstrate an inability to apply for the order themselves due to fear or other reasons. Following the amendments, competent authorities are now required to issue temporary restraining orders *ex officio* in situations where there is evident risk of serious violence that the order could mitigate.

180. While GREVIO acknowledges these advancements, it observes that the scope of the "inside-the-family restraining orders" remains restricted to intimate partners who permanently share a residence, thus excluding victims in less permanent living situations with perpetrators. Furthermore, the use of such orders still appears to be very low. While it is not possible to determine how many of these orders included the removal of the perpetrator from a residence, thus constituting emergency barring orders as foreseen by Article 52 of the convention, the overall number of both temporary and longer-term "inside-the-family restraining orders" in 2021 and 2022 were respectively 80 and 70.¹⁴⁶ This implies that the number of orders involving the removal of the perpetrator from a residence would be even lower.

181. **Recalling the findings issued in GREVIO's baseline evaluation report, GREVIO strongly encourages the Finnish authorities to step up efforts to increase the use of emergency barring orders, including by empowering all police officers to issue them immediately, expanding their scope to include couples not permanently sharing a residence, promoting their usefulness and ensuring their diligent enforcement.**

4. Restraining or protection orders (Article 53)

182. Restraining and protection orders are designed to prolong the protection afforded to the victim and her children by emergency barring orders and may be considered complementary to the protection offered by the latter. Under Article 53 of the convention, victims of all forms of violence against women should be able to obtain a protection order available for immediate protection –

145. See GREVIO's baseline evaluation report on Denmark, paragraph 207, and Malta, paragraph 218.

146. State report, Annex 16.

without undue financial or administrative burden being placed on the victim and irrespective of whether or not they choose to set in motion any other legal proceedings.

183. GREVIO's baseline evaluation had emphasised several key concerns about the implementation of Article 53 of the convention, including the insufficient issuance of restraining orders, the financial burden placed on victims when applying for such orders in court and the potential for exceptions to protection orders regarding communication about children, which undermined the intended purpose of such orders to create distance from abusive partners and ensure the safety of victims. GREVIO had also called for the Finnish law-enforcement authorities to actively refer victims to specialist women's support services when restraining orders are issued.

184. GREVIO notes with satisfaction that the reform of the Act on Restraining Orders also targeted some of these concerns. Notably, a new provision mandates the police or prosecutor to inquire whether the person protected by a temporary restraining order consents to sharing their contact details with specialist services. If consent is granted, the information must be promptly forwarded to relevant service providers. Additionally, the police or prosecutor are required to inform victims subject to a temporary restraining order about available support services.

185. Regarding exceptions to protection orders, the amendments introduced a requirement for contact to be deemed "manifestly necessary for a specific reason", in addition to being "appropriately reasoned". According to the authorities, this clarification emphasises that communication is permitted only in exceptional and unforeseen circumstances that are necessary and appropriate, thereby enhancing the safety of victims. GREVIO however notes the information provided by women's rights organisations indicating that the aforementioned amendment has not led to tangible changes in practice.¹⁴⁷ While acknowledging the additional safeguards introduced by the legislative amendments to ensure that exceptions must be both necessary and well-reasoned, GREVIO points to the risk inherent to such exceptions around contact for members of the family placed under a restraining order, which may indicate an inadequate understanding of the level of risk emanating from contexts of domestic violence to all members of the family, including children. As GREVIO has had occasion to note, it is of utmost importance to extend protection to children through effective risk assessment, including in the use of protection orders.¹⁴⁸

186. In addition, in response to a finding from the baseline evaluation report, the legislative changes included the removal of court fees in these cases and the provision of free legal assistance irrespective of financial circumstances, which GREVIO welcomes.

187. Last, GREVIO welcomes the reform of the Act on Restraining Orders that introduced electronic monitoring of extended restraining orders, which may entail prohibiting the perpetrator from entering certain areas or locations frequented by the victim, in addition to contacting the victim. The supervision of electronic monitoring is conducted by the probation service, and victims are provided with a mobile phone that alerts them if the perpetrator approaches restricted areas. However, GREVIO observes that electronic monitoring has only been implemented in two instances, with one encountering technical issues.¹⁴⁹

188. Despite these positive advancements, GREVIO notes with concern the low rate of use of restraining orders and the high rate of breaches. For instance, in 2021 and 2022, a total of 1 178 and 1 108 temporary and longer-term restraining orders, including "inside-the-family restraining orders", were issued nationwide.¹⁵⁰ However, it is important to note that these figures encompass all cases, not exclusively those involving violence against women. Among these, 694 and 861 were violated in 2021 and 2022, respectively, indicating that over half of the restraining orders are breached annually.¹⁵¹ GREVIO observes that during those years, 309 and 303 breaches resulted in convictions. Despite legal amendments requiring swift processing of breaches of restraining orders,

147. Written submission from 25 Finnish NGOs, p. 35.

148. See GREVIO's third-party intervention pursuant to Article 36, paragraph 2, of the European Convention on Human Rights, Application No. 62903/15 (ECHR 15 June 2021), paragraph 163.

149. Information obtained during the evaluation visit.

150. State report, Annex 16.

151. State report, Annex 17.

women's rights organisations maintain that court proceedings for such violations remain slow and that sanctions for violating restraining orders lack dissuasiveness.¹⁵²

189. GREVIO strongly encourages the Finnish authorities to take measures to increase the use of restraining and protection orders for women victims of all forms of violence covered by the Istanbul Convention and to ensure robust and systematic monitoring of compliance with these orders. GREVIO further strongly encourages the Finnish authorities to end the practice of allowing for exceptions in prohibitions on contact.

5. Measures of protection (Article 56)

190. Article 56 of the Istanbul Convention is a key provision for building trust at the level of judicial proceedings for women and girls who have experienced or who are witness to any of the forms of violence covered by the convention. It sets forth a non-exhaustive list of procedures designed to protect victims of violence from intimidation, retaliation and secondary victimisation at all stages of proceedings, during investigations and at trial. The drafters intended this list to be indicative, and parties may adopt additional protection measures that are more favourable than those provided in the convention. Moreover, intimidation and secondary victimisation can occur not only at the hands of perpetrators but also when investigations and judicial proceedings are not based on a gendered understanding of violence against women, which is why the practical application of measures of protection should be firmly anchored in such an understanding.

191. GREVIO notes the presence of certain measures aimed at safeguarding the privacy of victims of violence against women and mitigating the risk of re-traumatisation within legal proceedings in Finland. Notably, under the Finnish Act on the Openness of Government Activities, which also governs court proceedings, provisions allow for hearings to occur in camera or restrict public access to documents, particularly when it is deemed essential to protect the privacy of victims. GREVIO observes that, typically, all cases involving sexual violence are conducted in closed sessions, with associated documents remaining confidential for a duration of 60 years. However, cases on domestic violence or other forms of violence against women are not automatically held in camera, except in instances involving intimate images or sensitive medical information.

192. To mitigate the risk of re-traumatisation, courtrooms in Finland may use screens to physically separate victims from perpetrators during proceedings. GREVIO welcomes the information provided by the Finnish authorities indicating that video hearings of victims and witnesses are frequently used in cases of violence against women. Additionally, in more severe cases, perpetrators may be temporarily removed from the courtroom during a victim's testimony. However, the authorities emphasise that such action is taken sparingly to uphold the perpetrator's right to cross-examination. In court proceedings, video-recorded testimonies of victims of sexual violence, human trafficking or victims under the age of 15 are admissible to prevent repeated questioning. Subsequent to the defence's cross-examination, additional video recordings may be permitted. As per information provided by the Finnish authorities, while adult victims may still be summoned to testify before courts for supplementary questioning, they retain the right to decline and opt for the use of recorded testimony instead.¹⁵³

193. To uphold the safety of victims, GREVIO notes with satisfaction that the majority of courthouses feature separate waiting areas designated for victims and perpetrators. Additional measures may vary based on the specific circumstances of each case, including the provision of separate entry routes and security escort services for victims upon leaving the court premises. GREVIO has been apprised of instances where the perpetrator was held until the victim has departed the vicinity of the courthouse.¹⁵⁴

152. Written submission from 25 Finnish NGOs, p. 34.

153. Information obtained during the evaluation visit.

154. Information obtained during the evaluation visit.

194. In Finland, victims are notified of the perpetrator's release from prison or detention through a process outlined in the Criminal Investigation Act. Accordingly, the criminal investigation authority promptly informs victims of their right to receive such notifications. If victims choose to receive updates, the authority reaches out directly through written correspondence, phone calls or in-person communication. In cases where victims opt not to receive notifications, the investigation authorities have the discretion to inform the victim if there are reasonable grounds to suspect that the perpetrator will pose a threat to the life, health or liberty of the victim or a close person.

195. Regarding women who are subjected to or at risk of intersectional discrimination, according to the authorities, the presiding judge in such cases takes all requisite measures to address the individual needs of the victim. The authorities recognise the critical importance of the pretrial stage in identifying these needs, with lawyers playing a significant role in bringing them to the attention of those in the criminal justice system. For victims of violence with disabilities, the majority of court houses are accessible to individuals with physical disabilities, supplemented by measures such as sign language interpreters, assistive listening devices and accessible information such as documents in braille, which GREVIO welcomes.

Appendix I

List of proposals and suggestions by GREVIO

II. Changes in definitions, comprehensive and co-ordinated policies, funding and data collection in the areas of violence against women and domestic violence

B. Comprehensive and co-ordinated policies (Article 7)

1. Recalling the findings issued in its baseline evaluation report, GREVIO strongly encourages the Finnish authorities to develop a long-term national strategy that aims to achieve the comprehensive and co-ordinated policy approach required by the Istanbul Convention, giving due importance to all forms of violence against women and extending to all relevant entities and policy sectors, including social services, the healthcare sector, law enforcement and the judiciary as well as the family law sector. This strategy should be evaluated regularly on the basis of predefined indicators in order to assess its impact and ensure that policy making is based on reliable data (paragraph 24).

C. Financial resources (Article 8)

2. Recalling the findings issued in GREVIO's baseline evaluation report, GREVIO strongly encourages the Finnish authorities to:

- a. ensure sufficient public funding for measures included in the Action Plan for the Istanbul Convention aimed at preventing and combating all forms of violence against women, from both central government and well-being services counties while regularly assessing the financial and human resources needed for this purpose;
- b. develop appropriate long-term and sustainable financing solutions for NGOs providing non-residential specialist services to victims of violence against women;
- c. ensure that all relevant government agencies systematically introduce budget lines dedicated to measures to prevent and combat all forms of violence against women, in order to regularly monitor the level of the allocated budget spent with a view to demonstrating an increase over time in the budget earmarked and spent in this field. (paragraph 32)

D. Data collection (Article 11)

3. Social services

3. Recalling the findings issued in its baseline evaluation report and the standards contained in the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data regarding the confidentiality and respect for the privacy of victims, perpetrators and other persons involved (CETS No. 108), GREVIO urges the Finnish authorities to:

- a. develop data categories for mandatory use by the law-enforcement agencies, prosecution services and the judiciary on the type of relationship between the perpetrator and the victim, in order to document the nature of their relationship more specifically;
- b. harmonise data collection between law-enforcement agencies, prosecution services and the judiciary, with the aim of, inter alia, allowing the assessment of conviction, attrition and recidivism rates as well as following the progress of cases of violence against women and domestic violence through the justice system. (paragraph 46)

4. GREVIO further encourages the Finnish authorities to extend data collection in the public and private healthcare sector to all forms of violence against women, including domestic and sexual violence, forced abortion and forced sterilisation, and to introduce data collection in the social welfare sector in relation to all forms of violence against women (paragraph 47).

III. Analysis of the implementation of selected provisions in priority areas in the fields of prevention, protection and prosecution

A. Prevention

1. General obligations (Article 12)

5. Recalling the findings issued in GREVIO's baseline evaluation report, GREVIO strongly encourages the Finnish authorities to:

- a. promote and conduct, on a regular basis and at all levels, awareness-raising campaigns on all forms of violence against women that affect all pockets of society in order to challenge societal attitudes, cultural norms and gender stereotypes rooted in the perceived inferiority of women, including in co-operation with national human rights institutions, equality bodies, civil society, cultural and media institutions and non-governmental organisations, especially women's rights organisations;
- b. ensure that more preventive work is carried out to specifically address gender-based violence against women and girls with disabilities and other women at risk of intersectional discrimination, including, in particular, Sami women;
- c. regularly carry out impact assessments of any awareness-raising campaigns and primary prevention measures taken. (paragraph 57)

2. Education (Article 14)

6. GREVIO encourages the Finnish authorities to:

- a. increase efforts to ensure the practical implementation of the requirement to include in school curriculums or to otherwise impart knowledge on the elements listed in Article 14 of the Istanbul Convention. To this end, GREVIO invites the Finnish authorities to assess whether and to what extent relevant material developed by the National Agency for Education is being used;
- b. strengthen mandatory initial and in-service training of educators on different forms of violence against women and girls covered by the Istanbul Convention, including "honour-related violence" and FGM, as well as violence against women and girls who face intersectional discrimination, but also on the digital manifestations of violence against women, with a view to enabling them to detect girls and boys at risk and to refer them to appropriate mechanisms for support and protection. (paragraph 66)

3. Training of professionals (Article 15)

7. Recalling the findings issued in the GREVIO baseline evaluation report and in view of the persistent gaps in ensuring mandatory training of professionals whose contribution to a trust-based system of support, protection and justice is vital, GREVIO urges the Finnish authorities to ensure the provision of systematic and mandatory initial and in-service training on all forms of violence covered by the Istanbul Convention and the cultural specificities of women belonging to vulnerable groups supported by standardised protocols aimed at identifying, providing support to and further referring victims to other services. Such training should focus on the victims' human rights, safety, individual needs and empowerment, and on the prevention of secondary victimisation through a victim-centred and trauma-informed approach, and should be provided to all those in the justice, law-enforcement, social welfare, healthcare and education sectors. The impact of such training efforts should be regularly evaluated and maximised by drawing on the expertise of women's rights organisations and providers of specialist services (paragraph 78).

8. GREVIO further urges the Finnish authorities to ensure mandatory training of judges presiding over cases involving custody and visitation rights on:

- a. the negative effects that witnessing violence against women has on children and the importance of taking into account such instances when reaching a decision and/or agreeing or promoting mediation in such cases;
- b. the nature and dynamics of domestic violence, including the unequal power relations between the parties, as opposed to a mere conflictual relationship between spouses. (paragraph 79)

9. GREVIO also encourages the Finnish authorities to ensure the dissemination of all available guidelines for the handling of different forms of violence covered by the Istanbul Convention to all relevant professionals. (paragraph 80)

4. Preventive intervention and treatment programmes (Article 16)

a. Programmes for perpetrators of domestic violence

10. GREVIO strongly encourages the Finnish authorities to:

- a. roll out programmes for perpetrators of domestic violence throughout the country, including by setting up culturally and linguistically appropriate programmes for Sami boys and men and providing them with sustainable funding that is sufficient to ensure their long-term functioning and the ability to retain trained staff;
- b. ensure that perpetrator programmes are widely attended, including by incorporating them into the criminal justice system as a tool to reduce recidivism. (paragraph 87)

B. Protection and support

1. General obligations (Article 18)

11. GREVIO strongly encourages the Finnish authorities to take adequate measures, including legislative measures, to:

- a. introduce institutionalised structures for multi-agency co-ordination and co-operation among the different governmental and non-governmental agencies and service providers throughout the country;
- b. embed such initiatives in the nationwide policies to respond to all forms of violence against women and domestic violence, based on a gendered understanding and focusing on the human rights and safety of victims, as well as on their empowerment and economic independence;
- c. support such institutionalised structures with guidelines and co-operation procedures/protocols for authorities dealing with violence against women and domestic violence, including forced marriage and “honour-related violence”, as well as a system for sharing expertise and experience in handling such cases. (paragraph 95)

12. GREVIO further strongly encourages the systematic inclusion of specialist women’s support services run by NGOs, and representing victims in multi-agency work, in any formal and informal co-operation structures. (paragraph 96)

2. General support services (Article 20)

a. Social services

13. Recalling its findings in the baseline evaluation report, GREVIO strongly encourages the Finnish authorities to establish long-term support services to ensure the recovery of victims from violence and to ensure their economic independence. GREVIO further strongly encourages the Finnish authorities to provide adequate support tailored to the specific needs, rights and

circumstances of all victims while acknowledging the need to raise awareness of the various forms of violence against women, overcome language barriers and increase cultural sensitivity towards the specific situations of women from national minorities, for example Sami women (paragraph 103).

b. Healthcare services

14. GREVIO encourages the Finnish authorities to intensify their efforts to promote and implement standardised care paths in the public and private healthcare sectors in order to ensure the identification of victims, their diagnosis, treatment, documentation of the type of violence and the violence suffered, and referral to appropriate specialist support services in a gender-sensitive and non-judgmental manner, as well as the provision of a forensic report for victims documenting their injuries (paragraph 110).

3. Specialist support services (Article 22)

15. Recalling the findings issued in GREVIO's baseline evaluation report, GREVIO urges the Finnish authorities to take measures to:

- a. increase the number and capacity of women-only shelters providing safe accommodation to victims of all forms of violence against women, in line with the standards set by the Istanbul Convention and in an adequate geographical distribution, with the aim of achieving the standard set in the Explanatory Report to the Istanbul Convention of one family place per 10 000 head of population;
- b. ensure that shelters can accommodate and cater for the needs of women subject to intersectional discrimination, including Sami women and women with addiction issues;
- c. ensure the availability of immediate, medium and long-term specialist support services, including psychological support to victims of all forms of violence against women, in an appropriate geographical distribution, while catering for the specific needs of vulnerable women subject to intersectional discrimination. (paragraph 122)

4. Support for victims of sexual violence (Article 25)

16. With a view to further improving the response to sexual violence and rape as well as building the trust of victims in the system, GREVIO strongly encourages the Finnish authorities to:

- a. increase the number of rape crisis centres providing comprehensive and practical support, including immediate, short and long-term psychosocial support for all victims of rape and sexual violence;
- b. remove any barriers, including the 30-day time limit, to victims' access to the full range of specialist services provided by the SERI centres. (paragraph 129)

C. Substantive law

1. Custody, visitation rights and safety (Article 31)

17. Recalling the findings issued in GREVIO's baseline evaluation report, GREVIO urges the Finnish authorities to:

- a. ensure that the negative impact that violence against women has on children is reflected in legislation, and that incidents of violence against women are a mandatory legal criterion to be taken into account when deciding on custody and visitation rights;
- b. take measures to incorporate a systematic screening and risk-assessment process in cases concerning the determination of custody and visitation rights to establish whether violence has been an issue in the relationship. (paragraph 138)

2. Prohibition of mandatory alternative dispute resolution processes or sentencing (Article 48)

18. In support of the ongoing efforts to ensure the voluntary nature of mediation in criminal and civil law in connection with violence against women, GREVIO strongly encourages the Finnish authorities to pursue the planned legislative amendments aimed at excluding domestic violence cases from mediation. In the interim, GREVIO urges the Finnish authorities to take measures to ensure that initiation of mediation procedures does not result in the premature discontinuation of criminal investigations and incomplete collection of evidence. In this regard, and recalling its finding from the baseline evaluation report, GREVIO urges the Finnish authorities to reconsider the power vested in the police to propose mediation as a criminal justice measure in domestic violence cases, in order to ensure the effectiveness of criminal investigations and thereby maintain victims' trust in the system and their ability to access justice. (paragraph 148)

D. Investigation, prosecution, procedural law and protective measures

1. General obligations (Article 49) and Immediate response, prevention and protection (Article 50)

a. Reporting to and immediate response and investigations by law-enforcement agencies

19. Recalling the findings issued in GREVIO's baseline evaluation report, GREVIO urges the Finnish authorities to equip all relevant law-enforcement authorities with the resources, knowledge and skills to respond promptly and appropriately to every report of violence covered by the Istanbul Convention, including their digital manifestations, in particular by systematically integrating a gender-sensitive and trauma-informed understanding of all forms of violence against women into police procedures (paragraph 159).

b. Effective investigation and prosecution

20. GREVIO urges the Finnish authorities to take all necessary measures to ensure that investigations into all forms of violence against women covered by the Istanbul Convention are conducted without undue delay, and that investigating authorities proactively collect evidence beyond the victim's statement in order to ensure effective and timely prosecution, including in the context of the newly introduced consent-based legal provision and digital manifestations of violence against women (paragraph 165).

c. Conviction rates

21. GREVIO urges the Finnish authorities to:

- a. take measures to identify and address all factors contributing to the high levels of attrition in criminal justice proceedings in relation to cases of violence against women covered by the Istanbul Convention, including the reasons for delays in such proceedings, in order to ensure, by legislative and other measures, greater accountability of perpetrators;
- b. take sustained measures to reinforce the capacity of courts that hear cases of violence against women so as to reduce delays;
- c. ensure that sentences and measures imposed for the offences covered by the Istanbul Convention are effective, proportionate and dissuasive. (paragraph 169)

2. Risk assessment and risk management (Article 51)

22. GREVIO strongly encourages the Finnish authorities to take legislative and other measures to ensure that a standardised and gender-sensitive risk-assessment and safety-management procedure is used systematically throughout the country in all cases of violence against women covered by the Istanbul Convention. (paragraph 177)

3. Emergency barring orders (Article 52)

23. Recalling the findings issued in GREVIO's baseline evaluation report, GREVIO strongly encourages the Finnish authorities to step up efforts to increase the use of emergency barring orders, including by empowering all police officers to issue them immediately, expanding their scope to include couples not permanently sharing a residence, promoting their usefulness and ensuring their diligent enforcement. (paragraph 181)

4. Restraining or protection orders (Article 53)

24. GREVIO strongly encourages the Finnish authorities to take measures to increase the use of restraining and protection orders for women victims of all forms of violence covered by the Istanbul Convention and to ensure robust and systematic monitoring of compliance with these orders. GREVIO further strongly encourages the Finnish authorities to end the practice of allowing for exceptions in prohibitions on contact. (paragraph 189)

Appendix II

List of the national authorities, other public bodies, non-governmental organisations and civil society organisations with which GREVIO held consultations

National authorities

- Ministry of Foreign Affairs
- Ministry of Economic Affairs and Employment
- Ministry of Education and Culture
- Ministry of Finance
- Ministry of Interior
- Ministry of Justice
- Ministry of Social Affairs and Health
- Finnish Border Guard
- Finnish Immigration Service
- Finnish National Agency for Education
- Helsinki District Court
- NAPE Committee
- National Institute of Health and Welfare
- National Police Board
- National Prosecution Authority
- Prison and Probation Service
- Statistics Finland
- City of Helsinki
- Hennala Police Department
- Päijät Häme Central Hospital Seri Support Center
- Wellbeing Services County of Päijät-Häme

Public bodies

- Deputy Chancellor of Justice
- Finnish Human Rights Centre
- Non-Discrimination Ombudsman
- Ombudsman for Equality
- Ombudsman for Older People
- Parliamentary Ombudsman of Finland

Non-governmental organisations

- Amnesty International Finland
- Didar, non-governmental organisation working on honour-related violence
- Fem-R, feminist and anti-racist non-governmental organisation
- Finnish Ecumenical Council
- Finnish League for Human Rights
- Helsinki Pride Community
- Invalidiliitto, non-governmental organisation working with people with physical disabilities
- Iraqi Women's Association
- MONIKA – the Multicultural Women's Association
- Naisten Linja (Women's Line)
- NYTKIS Coalition of Finnish Women's Associations
- RIKU (Victim Support Finland)
- Rusetti, non-governmental organisation working with women with disabilities
- Save the Children Finland

-
- Seta, LGBTIQ rights NGO
 - Setlementti Tampere, non-governmental organisation working on equality and non-discrimination
 - Support Centre Varjo for post-separation abuse
 - Tampere shelter
 - The Federation of Mother and Child Homes and Shelters
 - Unioni, women's rights organisation
 - Unbeatable Line in Espoo, perpetrator programme
 - VIOLA – Free from Violence, women's rights organisation

Civil society and other organisations

- Johanna Niemi, Dean, Faculty of Law, University of Helsinki
- Minna Kimpimäki, Professor, University of Lapland

*Building trust
by delivering support,
protection and justice*

Finland

First thematic
evaluation report

GREVIO

Group of Experts
on Action against Violence
against Women and
Domestic Violence



Council of Europe Convention
on preventing and combating
violence against women
and domestic violence
(Istanbul Convention)

GREVIO(2024)9
published on 3 December 2024